DOCUMENT RESUME

ED 271 048	HE 019 409

TITLE	Postsecondary Education Accreditation Study. A Study Pursuant to the 1984 General Appropriations Act (Chapter 84-220, Laws of Florida). 1985--Report 3.
INSTITUTION	Florida State Postsecondary Education Commission, Tallahassee.
PUB DATE	21 Feb 86
NOTE	132p.
PUB TYPE	Reports - Descriptive (141)
EDRS PRICE	MF01/PC06 Plus Postage.
DESCRIPTORS	*Accreditation (Institutions); *Accrediting Agencies; *College Programs; Distance Education; Feasibility Studies; Postsecondary Education; Private Colleges; Professional Education; *Program Evaluation; Public Colleges; Regional Cooperation; *Specialization; State Colleges; *State Licensing Boards
IDENTIFIERS	*Florida

ABSTRACT

A report on the feasibility of creating a Florida state system of accreditation for public and private postsecondary institutions and programs is presented. Following background information on accreditation in Florida and at the regional and national levels, specialized accreditation is addressed, along with program review, and occupational licensure and certification. It is concluded that the state should not establish an alternative or supplementary accreditation system. Recommendations are offered concerning: regional accreditation, curtailing the power and growth of specialized accrediting agencies, minimizing duplication in accreditation and program review, coordination between institutional licensure by the state and accrediting agencies, and cooperation among southern states. Appendices include: information on the accreditation status of professional schools and specialized programs by institution; a comparison of two state licensing boards (for private colleges and for vocational, technical, trade, and business schools; the state board rules on program review; information on licensure and regulation of colleges and programs in 36 states; and a study on accreditation and authorization of distance learning through telecommunications. A bibliography is included. (SW)

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A STUDY OF POSTSECONDARY EDUCATION ACCREDITATION

Report and Recommendations of the

FLORIDA POSTSECONDARY EDUCATION PLANNING COMMISSION

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1985-REPORT 3

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The Postsecondary Education Planning Commission initially created by executive order in 1980 and subsequently given statutory authority, serves as an advisory body to the State Board of Education on all postsecondary education matters. The Commission is composed of 11 members of the general public and one full-time student registered at a postsecondary education institution in Florida. Members are appointed by the Governor with the approval of three members of the State Board of Education and subject to confirmation by the Senate.

The major responsibility of the Commission is preparing and updating every five years a master plan for postsecondary education. The enabling legislation directed that the Plan "shall include consideration of the promotion of quality, fundamental educational goals, programmatic access, needs for remedial education, regional and state economic development, demographic patterns, student demand for programs, needs of particular subgroups of the population, implementation of innovative educational techniques and technology, and the requirements of the labor market. The capacity of existing programs, in both public and independent institutions, to respond to identified needs shall be evaluated and a plan shall be developed to respond efficiently to unmet needs."

Other responsibilities include recommending to the State Board of Education program contracts with independent institutions; advising the State Board regarding the need for and location of new programs and branch campuses of public postsecondary education institutions; reviewing public postsecondary education budget requests for compliance with the State Master Plan; recommending to the Commissioner of Education proposals for support through the Postsecondary Cooperation Trust Fund; and periodically evaluating the State's 28 regional coordinating councils for vocational education, adult general education and community instructional services.

Further information about the Commission, its publications, meetings and other activities may be obtained from the Commission office, 304 Knott Building, Department of Education, Tallahassee, Florida, 32301; telephone (904) 488-7894.

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POSTSECONDARY EDUCATION PLANNING COMMISSION

Postsecondary Education
Accreditation Study

A Study Pursuant to the
1984 General Appropriations Act
(Chapter 84-220, Laws of Florida)

1985 - Report No. 3

February 21, 1985

TABLE OF CONTENTS

Page

EXECUTIVE SUMMARY...i

I. INTRODUCTION...1

II. POSTSECONDARY ACCREDITATION IN FLORIDA........................3

III. THE ROLE OF STATE GOVERNMENT IN INSTITUTIONAL AND PROGRAM REGULATION.....16

IV. ISSUES AND RECOMMENDATIONS....................................26

  A. Feasibility of a State System of Postsecondary Accreditation.....26

  B. Regional Accreditation of Florida Postsecondary Education Institutions.....28

    - The Commission on Colleges of the Southern Association of Colleges and Schools

      - Emphasizing Quality in Accreditation Standards

      - An Alteration in Regional Accreditation--Self-Study and Visitation by Exception

      - Modifications Affecting the Visitation Team

    - The Commission on Occupational Education Institutions of the Southern Association of Colleges and Schools

  C. Curtailing the Power and Growth of Specialized Accrediting Agencies in Florida.....35

  D. Minimizing Duplication in Accreditation and Program Review.....39

  E. Coordination Between Institutional Licensure by the State and Accrediting Agencies 43

    - State Regulation and Accreditation of Off-Campus Programs

    - State Regulation and Accreditation of Distance Learning through Telecommunications

- F. Other Accreditation Issues.....47
  - Credit Transfer
  - Student Financial Aid Eligibility
- G. Planning for Collaboration Among the Southern States.....52

V. BIBLIOGRAPHY.....53

VI. APPENDICES

- A. Accrediting Associations
Accreditation of Specialized Programs and Professional Schools in the State University System
- B. Costs for Regional and Specialized Accreditation as Reported by Selected Florida Institutions
- C. A Comparison of the State Board of Independent Postsecondary Vocational, Technical, Trade and Business Schools and the State Board of Independent Colleges and Universities
- D. State Board Rule on Program Review
- E. COPA/SHEEO Study on Accreditation and the Authorization of Distance Learning Through Telecommunications
- F. Information on Institutional and Program Regulation in Other States

EXECUTIVE SUMMARY

The 1984 Legislature directed the Postsecondary Education Planning Commission to conduct a study as to the feasibility of the creation of a state system of accreditation for public and independent postsecondary institutions and programs as an alternative or supplement to current accreditation practices. This legislative charge to the Commission was based in part on the belief that accrediting bodies have failed to control quality and that the accrediting process has become cumbersome, expensive and duplicative. After an analysis of the issues and implications involved in withdrawal from regional and specialized accrediting associations, and the duplication of efforts if state accreditation were added to the existing accreditation structure for Florida institutions, the Commission concludes that the State should not establish an alternative or supplementary accreditation system.

The Commission believes, however, that changes are needed in regional and specialized accreditation and it has presented several recommendations for modification and coordination in the practices of accrediting associations. First, in light of the improvements in the variety of information available at the institutional and state levels, including the internal planning and evaluation processes taking place at many postsecondary institutions, the Commission has proposed a voluntary self-study and visitation by exception model. This proposed strategy will reduce the financial and time burdens of the current process and help to alleviate the redundancy resulting from the existence of numerous accrediting groups. An annual report using existing quantifiable data, supplemented by other relevant documents, would provide the basis for a judgment as to whether the reporting institution complies with minimum standards. If no deterioration in the quality of the institution being examined is noted from the previous report, the institution which has completed a number of successful comprehensive accreditation cycles could choose to be exempt from the mandatory self-study and visitation. The Commission believes that the adoption of COPA's Common Language for Postsecondary Accreditation in the program review, institutional licensure, and accreditation processes would facilitate the implementation of this voluntary non-cyclic visitation by exception program as well as other Commission recommendations.

Second, the Commission acknowledges that changes have taken place recently in the Southern Association of Colleges and Schools (SACS) such as the addition of a standard which places increased emphasis on outcomes in accreditation criteria and the creation of a network of state commissioners on the SACS Commission on Colleges. The Commission believes that this newly-established structure of Florida Commissioners can serve as a vehicle for change in such areas as (a) monitoring the implementation and application of the accreditation standards, particularly the new standard on outcomes assessment; (b) encouraging institutional leaders and senior officials in Florida's educational institutions to serve periodically on a visitation team; (c) emphasizing the importance of collaboration between the Commission on Colleges and the Commission on Occupational Education Institutions when an occupational education program is accredited within a degree-granting institution; and (d) triggering an on-site visitation by SACS to any off-campus site of a SACS-accredited institution when deficiencies are noted.

Third, the Commission has noted the existence of duplication between the state regulatory functions (e.g. program review) and the specialized accreditation process. Duplication was also noted in the requirements of the regional and various specialized accrediting associations. Greater cooperation and collaboration are needed among regional and specialized accrediting associations, and a linkage between the program review process and specialized accreditation is warranted. Several recommendations are being made to achieve these goals.

Fourth, the Commission has observed that professional accrediting associations have grown in power and number, and in many cases they have placed highly restrictive requirements on institutions. The primary reason for this growth in power is the linkage between specialized accreditation and the state process of occupational licensure. The Commission believes that some of the authority of the specialized accrediting associations should be reduced. Authority can be reduced through uncoupling accreditation and occupational licensure where sufficient control for quality assurance exists.

Fifth, the Commission examined the scope of the current process of institutional licensure by the State and the relationship of this process to accreditation. The Commission is including recommendations designed to improve the coordination of state licensure and regional accreditation in the areas of off-campus programs and telecommunications, and to monitor more closely the off-campus activities of accredited institutions by the Southern Association.

Sixth, among the various functions which accreditation serves, two are of particular interest to students enrolled in postsecondary institutions which are accredited by a COPA-recognized national rather than regional agency. These are determination of eligibility for transfer of credit and participation in state financial aid programs. The Commission presents several issues and recommendations to be considered in credit transfer and state financial aid.

Finally, the Commission recognizes that change will take time. The complicated, heterogeneous and democratic governing structure of the Southern Association of Colleges and Schools must approve any modifications in procedures or policy. Professional associations will be reluctant to modify their practices and relinquish their authority. A single state will have little impact upon a regional or national accrediting body. The Commission believes that multi-state collaboration is essential to impact the accrediting associations in a constructive manner.

A summary of the specific major recommendations for change proposed by the Commission are as follows:

1. The regional accreditation process should be modified to permit well-established institutions which provide evidence that they are meeting minimum standards of quality to choose to be exempt from the mandatory self-study and visitation cycle.

2. The Florida Commissioners on the SACS Commission on Colleges should carefully monitor the timely implementation of the revised set of accreditation standards adopted by SACS.

3. The State's governing and coordinating boards should encourage institutional leaders and senior officials at private and public

postsecondary institutions to serve periodically on accreditation visitation teams.

4. The State's governing and coordinating boards should examine the possibility for cooperative agreements with SACS which would involve state board representatives assisting with accreditation team visits.

5. The standards utilized by the SACS Commission on Occupational Education Institutions should be incorporated into those utilized by the Commission on Colleges when the occupational education program is accredited as part of a degree-granting institution.

6. The Department of Professional Regulation should examine the linkage between specialized accreditation and occupational licensure. In certain professions when sufficient control for quality assurance already exists, the State should consider deletion of the requirement that applicants for an occupational license to practice in Florida must have graduated from a program accredited by a specialized accrediting association.

7. The practice of imposing unnecessary or restrictive standards on programs by professional accrediting associations and the proliferation of these specialized accrediting associations and committees should continue to be addressed by COPA and the curtailment of such standards endorsed by the State's governing and coordinating boards.

8. The Board of Regents and State Board of Community Colleges should promote the adoption of a common data base by encouraging use of COPA's Common Language Handbook for Postsecondary Accreditation in the program review, institutional licensure, and accreditation processes.

9. In an effort to minimize duplication and reduce costs, the State's governing and coordinating boards should strive to link the program review process and specialized accreditation and also, when practical, encourage collaboration in visitations among regional and specialized accrediting associations.

10. If deficiencies in the quality of the off-campus activities of accredited institutions chartered in Florida are noted, these deficiencies should be reported to the Florida Commissioners on SACS and an on-site visit should be conducted by SACS to the campus in question.

11. SACS policy should require that cyclic on-site visitations be conducted by Southern Association to all off-campus sites of SACS-accredited institutions operating in Florida.

12. When an on-site visitation is conducted to an off-campus site in Florida by a regional accrediting association outside the Southern region, the Southern Association should be invited to participate in a joint visitation.

13. Florida's licensing boards should negotiate a joint agreement with SACS which would facilitate adoption of procedures to ensure proper control of distance learning through telecommunications.

14. Local articulation agreements between postsecondary institutions which are accredited by a national accrediting association and other postsecondary education institutions in Florida should be encouraged and facilitated.

15. The criteria used to determine institutional eligibility for participation in state financial aid programs should be examined by the Department of Education to determine whether other standards may be appropriate as an addition to, or substitution for, accreditation criteria.

16. The Commission should host a meeting in Spring 1985 for representatives of the 11 Southern states under the jurisdiction of the Southern Association to determine whether regionwide consensus exists on needed modifications in accreditation and, if so, seek an interstate approach to promoting and monitoring change.

I. INTRODUCTION

Proviso language in the 1984 General Appropriations Act directed the Postsecondary Education Planning Commission to conduct a feasibility study as to the creation of a state system of accreditation for public and independent postsecondary institutions and programs as an alternative or supplement to current accreditation procedures. Commission staff met initially with appropriate officials from the Governor's Office, legislative staff, and the State's regulatory boards to clarify the direction of the study, and to identify those issues and concerns of significance to Florida officials.

To direct this study, the Commission designated a Postsecondary Accreditation Study Committee comprising Robert Mautz, Chairman, Margaret Black and Rayma Page. The Committee proceeded according to the pattern which has characterized the operation of previous committees of the Postsecondary Education Planning Commission. This procedure involves immersion in the appropriate literature, accumulation and digestion of facts and statistics resulting from the pursuit of similar questions by other states, the federal government or private organizations such as foundations, and data gathering through surveys and public hearings. The full Commission is kept apprised of all activities, relevant facts and tentative conclusions and invited to comment at all stages of the Committee's work. A preliminary report with recommendations is formulated by the Committee, widely circulated and comments are invited. A final report is then drafted and presented to the full Commission for possible modification, adoption and onward transmittal to the appropriate organizations or individuals.

A preliminary report was disseminated for public comment on January 18, 1985. Several suggestions were made and appropriate changes incorporated. The final report was adopted by the Commission on February 21, 1985 and transmitted to the Legislature and State Board of Education prior to March 15, 1985.

The Commission did not have the benefit of extensive legislative hearings or debate which may precede the enactment of legislation. During the course of the process outlined above, however, the underlying reasons for the legislative directive became evident. Accreditation originated as a voluntary action of institutions at a time when those institutions were less numerous, smaller and much less complex than is the case today. The regional associations which became the accrediting agencies were concerned with accreditation of the institution as a whole. As knowledge and training became more specialized, national associations assumed responsibilities for accreditation of programs essential to the training for entry into those professions represented by the associations. In the early 1930's, the regional associations which had to deal with a growing number of institutions with widely different characteristics changed their emphasis so that accreditation was based upon goals, process, and resources rather than outcomes or quantified achievement.

By 1980, these two thrusts augmented a growing dissatisfaction with the accrediting process. The regional accrediting process, at least in the southern region, seemed remote from the concerns of quality which dominated the public mind and manifested itself in legislative enactments. At the same time, regional accreditation had become cumbersome and expensive. Thus, for many institutions benefits flowing from the process of accreditation as opposed to the fact of accreditation bore little relationship to cost and effort. Growth of power of professional accrediting groups and their proliferation, or at least their subdivision by programs, resulted not only in segmented duplication but also a reduction of program control and the freedom to allocate resources on the part of the central university administration. Large universities began to spend increasing amounts of money and time on the total accreditation process.

Legislatures, prodded by a concerned public, assumed a leadership role in the educational process and, among other things, imposed quality control measures at various steps in the educational continuum. Publicly-financed universities, especially in growing states such as Florida, assumed a more dominant educational role in the state, particularly in terms of the relative numbers of students educated in public rather than private institutions. Legislatively-created administrative organizations charged with oversight of public institutions became a major force in program review and measurement of institutional quality. For such universities, the sense of needless duplication was augmented.

A legislative estimate that accrediting bodies had failed to control quality and that their efforts may be a costly and wasteful anachronism probably led to the inquiry as to whether state action would be a reasonable substitute. The Commission's answer to this inquiry is that although the current accreditation process contains much which can be criticized, the answer to the current state-of-affairs does not lie in substituting accreditation by a state-created agency for the existing system. Rather, the answer must lie in change, coordination and modification of the practices of the accrediting agencies. Some of the authority of the professional accrediting agencies must be curtailed by untying accreditation and automatic benefits flowing from that accreditation, such as requiring accreditation as a precondition for taking licensure examinations.

In the pages which follow, the reasoning of the Commission which led to these conclusions and the recommendations for change are addressed. It should be emphasized that change will be slow. The extraordinary diversity of interests, goals and standards represented by membership of the Southern Association of Colleges and Schools, the democratic and unwieldy governance structure of that organization and the disproportionate voting strength of institutions which do not share the problems and frequently the concerns of the large, complex public and private universities make change a formidable challenge. Professional associations will be reluctant to relinquish authority. They possess the potential to marshall substantial political influence. No state acting alone will be able to influence the goals, quality measures, methods, number or scope of the various accrediting groups. Each state can do something. In addition, a way must be sought for concerned states to collectively and constructively impact the accrediting organizations. The latter are too important to education to have their independence chained. The states now play too prominent a supporting role to have their concerns ignored.

II. POSTSECONDARY ACCREDITATION IN FLORIDA

This chapter provides background information on postsecondary accreditation. It addresses the purposes of accreditation and historical development of postsecondary accreditation in the United States. Information is presented on regional and national institutional accreditation in Florida and on programmatic or specialized accreditation. The relationship of state governmental regulation to postsecondary accreditation will be discussed in Chapter III.

Accreditation can be defined as the process of peer review through which an association recognizes an institution or an individual program of study as having met a set of predetermined standards (Shelden, 1960). The American system of accreditation in higher education is depicted as a non-governmental, voluntary self-regulatory process. Therefore, accreditation can be separated from such government regulatory processes as program approval and state licensure or authorization of institutions and programs.

The two principal types of accreditation and accrediting associations are institutional and specialized or programmatic. Institutional accreditation focuses on the entire college and university and it is carried out by associations which are regional and national in scope. Six regional accrediting associations with nine regional accrediting commissions accredit degree and non-degree postsecondary institutions. In addition, four national associations accredit institutions; for example, the Association of Independent Colleges and Schools accredits private junior and senior colleges of business and the National Association of Trade and Technical Schools accredits private trade and technical schools. Specialized or programmatic accreditation is limited to discrete educational programs within institutions and specialized accrediting associations are normally supported by or associated with the appropriate professional organization or group (e.g. National Council for Accreditation of Teacher Education and the National Architectural Accrediting Board).

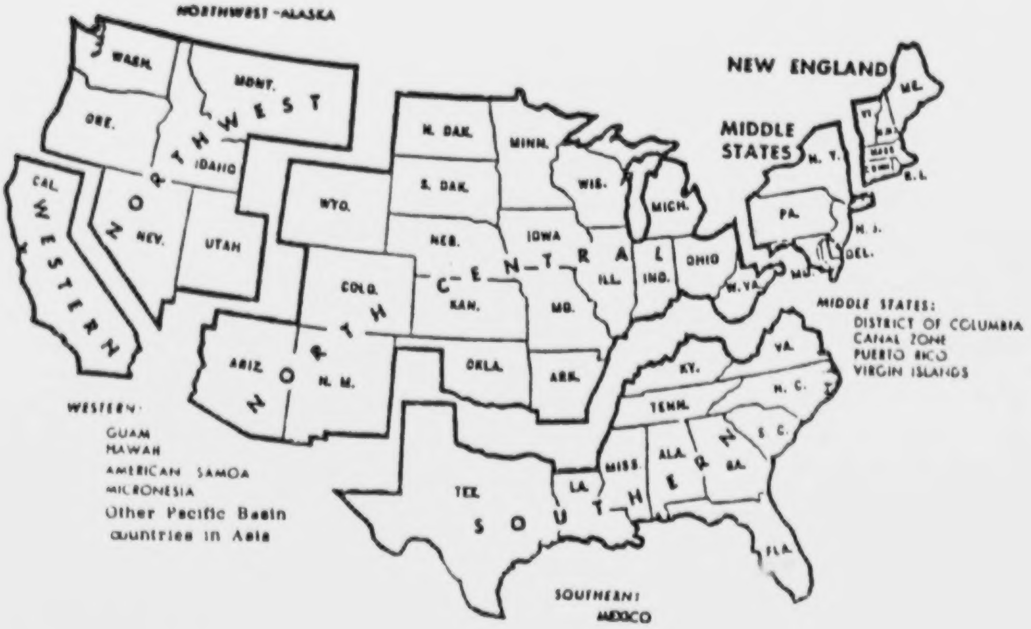
Historical Development of Accreditation

The Board of Regents of the University of the State of New York was established in 1784 and is the oldest continuous accrediting agency in America. In 1787, the New York State Board of Regents was charged by the New York Legislature with the responsibility of visiting colleges, accrediting or registering curricula at each institution and reporting annually to the Legislature. The New York State Board of Regents' accreditation function continues to be mandated by New York law and applies to all public, independent and proprietary institutions in the state. With the exception of New York State, however, it was the institutions themselves which in the latter part of the nineteenth century established a self-regulatory means of ensuring quality in higher education which is known as accreditation.

Regional accreditation first emerged when secondary schools and colleges in geographic proximity met and placed similar requirements on college admissions. The New England and North Central associations were organized by secondary school educators who were interested in preparing students for college examinations. In the South and Middle Atlantic states the impetus came from college educators who desired to maintain closer relationship among institutions and improve standards. Today six regional accrediting associations and nine commissions within these associations monitor postsecondary education. The six regional accrediting associations and the geographic areas of responsibility as they now exist are illustrated in Figure One.

FIGURE ONE

REGIONAL ACCREDITING ASSOCIATIONS OF THE UNITED STATES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VIRGIN ISLANDS
WESTERN:
GUAM
HAWAII
AMERICAN SAMOA
MICRONESIA
Other Pacific Basin
countries in Asia
SOUTHERN:
MEXICO

Source: California Postsecondary Education Commission, 1984

The North Central Association established institutional standards in 1895, the Southern Association in 1917, Middle States Association in 1919, Northwest Association in 1923 and Western Association in 1948. The last of the six regional associations to set standards for member institutions was the New England Association in 1952. The first set of standards to be adopted by colleges and universities in the North Central Association included a list of specific criteria to be applied equally to all institutions in the region and were considered to be a rigorous assessment of quantified achievement (Carnegie Foundation, 1982). The Southern and Middle States Associations followed with similar measurement criteria until the 1930's when regional associations began to accredit institutions on the basis of institutionally-defined objectives rather than a uniform set of product-oriented standards. During this period the process of accreditation as we know it today emerged. The focus shifted to stimulating a postsecondary institution towards self-improvement in meeting its own goals and objectives within the context of minimum criteria or guidelines as opposed to a process based on uniform, quantitative measurement standards applied equally to all institutions in the region.

Coordination of Accreditation at the National Level

The National Commission on Accrediting was established as a coordinating agency in 1949 in an attempt to assure cooperation among specialized accrediting associations. The Federation of Regional Accrediting Commissions of Higher Education was created in 1964 to serve as the coordinating body for regional accrediting associations. These two agencies merged in 1975 to form the Council on Postsecondary Accreditation (COPA) which continues to be recognized as the oversight agency for postsecondary accreditation. According to COPA, its responsibilities include the recognition, coordination and periodic review of its member accrediting associations and the appropriateness of existing or proposed accrediting associations through the granting of recognition. The Council of Postsecondary Accreditation (COPA) is a "nongovernmental organization that works to foster and facilitate the role of accrediting agencies in promoting and insuring the quality and diversity of American postsecondary education" (COPA, 1983). Thirteen commissions within COPA comprise the Assembly of Institutional Accrediting Bodies representing the six regional accrediting agencies (with nine commissions) and four accrediting bodies which represent special types of institutions (business, trade, technical, home study, bible). The Assembly of Specialized Accrediting Bodies comprises 36 specialized (programmatic) accrediting groups. Additionally, the national postsecondary education community is represented in COPA governance through participation by seven major higher education organizations (AACJC, ASSCU, ACE, AAC, AAU, NAICU, NASULGC) on the COPA Assembly of National Postsecondary Education Organizations.

The Federal Government and Accreditation

During the past several decades, the federal government has created a vast array of special programs for postsecondary education. Funding for these federal programs flows directly or indirectly to both private and public postsecondary institutions. Accordingly, Congress has been concerned that quality programs are being provided by the institutions which receive these federal dollars. Quality assurances and institutional eligibility to receive federal funding has become linked to accreditation.

The primary event which triggered the involvement of the federal government in postsecondary education and accreditation was the implementation of the 1944 Servicemen's Readjustment Act or GI Bill of Rights. Through this federal assistance program, numerous educational benefits were available to the returning veteran. Institutions were reimbursed directly for the number of enrolled veterans; the federal government had no control over which institutions the veterans could attend. Consequently, during the five-year period following the implementation of this Act, the number of institutions, particularly vocational and technical schools, was estimated to have tripled. Many of the schools were not accredited nor recognized by the state in which they were operating. As a result of the mass production of postsecondary institutions and the alleged fraud and cheating associated with the use of these federal funds, the United States Commissioner of Education was directed in 1952 to "publish a list of nationally recognized accrediting agencies and associations which he determines to be a reliable authority as to the quality of training offered by an educational institution" (Public Law 82-550). Federal funding for postsecondary educational programs now requires that an institution be licensed by the state in which it is operating and be accredited by a nationally recognized accrediting body. After this restriction of federal dollars to accredited schools, several institutions which once chose autonomy from accrediting bodies, considered accreditation a requirement for financial survival. Accrediting associations continue to be a primary source of information for the federal government as participation in federal programs and the disbursement of funds are restricted to institutions accredited by an association which is recognized by the federal government.

State Accreditation in Florida's Community Colleges

During the emergence of the community college system in Florida in the 1960's, the State had an institutional accreditation process for these institutions. State accreditation involved a self-study, a visiting committee of community college and non-community college personnel and a report submitted to the Commissioner of Education. SACS accreditation of the state community colleges continued simultaneously during this period; however state accreditation was terminated in the 1973 due to duplication of efforts with SACS.

The chronological chart on the next page highlights the important events in the historical development of accreditation.

Regional Institutional Accreditation

The Southern Association of Colleges and Schools (SACS) is the regional accrediting agency for eleven southeastern states, including Florida. The SACS Commission on Colleges accredits both public and private, profit and non-profit postsecondary degree-granting institutions. In 1971, the Southern Association created the Commission on Occupational Education Institutions to accredit non-degree granting institutions of occupational education.

The accreditation process occurs on a periodic basis. The first reaffirmation takes place five years after initial accreditation and institutions are then required to be visited on a ten-year cycle basis. The process of institutional accreditation for the SACS Commission in Colleges involves the following steps:

a. The institution prepares a comprehensive self-study report utilizing the _Standards of the College Delegate Assembly_. (In December 1984, these standards were replaced by the _Criteria for Accreditation_). The _Manual for Accreditation_ states that the self-study process should be broadly participatory and that faculty, administrators, staff and students should be asked to serve on committees which will examine all aspects of the institution. The self-study report includes the findings and recommendations of the various committees. SACS suggests a minimum of 18 months for the self-study and committee visit. Self-study reports range in size from a few hundred pages for smaller institutions and special self-studies to 1000 pages or more for large universities. The planning flow chart in Figure Two on page 8 is included in the SACS manual.

HISTORICAL DEVELOPMENT OF ACCREDITATION

1787 State oversight of education began when the University of the State of New York (the New York Board of Regents) was established as a board for colleges and schools in the state, with the responsibility to visit every college yearly, register each curricula at each institution, and report yearly to the Legislature.

1847 The first voluntary non-profit educational association was initiated with the establishment of the American Medical Association, although the Association did not begin to accredit medical schools until 1906.

1900-1901 Specialized programmatic accrediting associations were initiated by the Association of American Law Schools (1900), the Society of American Foresters (1900), and the Committee on the Education of the American Osteopathic Association (1901).

1895-1952 Accrediting standards were established and put into operation by the six regional associations: North Central in 1895, Southern in 1917, Middle States in 1919, Northwest in 1923, Western in 1948, and New England in 1952.

1947 The American Association of Bible Colleges was established.

1949 University presidents created the National Commission on Accrediting to limit the proliferation of accrediting agencies.

1952 Congress passed the Veterans Readjustment Assistance Act and, to protect use of veterans' educational grants, authorized the Commissioner of Education to "publish a list of nationally recognized accrediting agencies and associations which he determines to be reliable authority as to the quality of training offered by an educational institution" (Public Law 82-550, Section 1775).

1952- Three national institutional accrediting agencies were established: The 1965 Association of Independent Colleges and Schools (1952), the Accrediting Commission of the National Home Study Council (1955), and the National Association of Trade and Technical Schools (1965).

1962 Incorporation of the Southern Association of Colleges and Schools as a non-profit corporation composed of three commissions (secondary, elementary and colleges). In 1971, a fourth commission (on Occupational Education Institutions) was added.

1972 The Higher Education Amendments Act expanded the eligibility for participation in federally funded financial assistance programs to vocational and technical institutions that were ineligible for regional accreditation but that were certified or approved by a federally recognized state agency.

1975 The Council on Postsecondary Accreditation (COPA) was established as the educational community's oversight agency on accreditation through the consolidation of the Federation of Regional Accrediting Commissions of Higher Education and the National Commission on Accrediting.

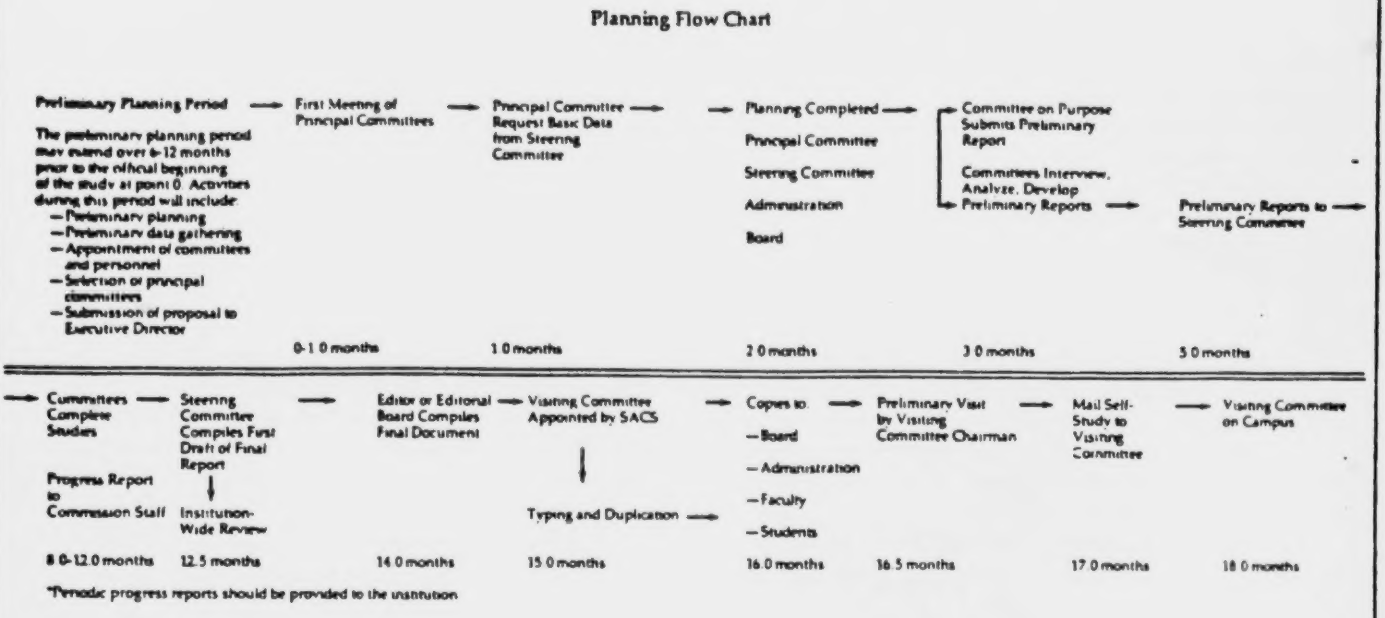
Source: Adapted from "Public Policy, Accreditation, and State Approval in California", California Postsecondary Education Commission, 1984

b. After the self-study report is received by the Commission, a visiting team of peer evaluators is sent to the institution. In general, there is a visiting team member for each of the organization areas and programs on campus. The self-study report serves as a guide to members of the visiting team in assessing the institution's effectiveness. During the visitation, interviews are conducted on campus with administrators, faculty, staff and students.

c. Under the direction of the chairman, the visitation team prepares a visiting committee report which contains recommendations and suggestions.

d. The Commission reviews the visiting team's report, makes any corrections in consultation with the chairman, and sends the official report to the institution. In some cases the Commission requests additional information or corrections before the accreditation decision is made.

FIGURE TWO


Planning Flow Chart
Preliminary Planning Period
The preliminary planning period may extend over 6-12 months prior to the official beginning of the study at point 0. Activities during this period will include:
—Preliminary planning
—Preliminary data gathering
—Appointment of committees and personnel
—Selection of principal committees
—Submission of proposal to Executive Director
First Meeting of Principal Committees
0-1.0 months
Principal Committee Request Basic Data from Steering Committee
1.0 months
Planning Completed
Principal Committee
Steering Committee
Administration
Board
2.0 months
Committee on Purpose Submits Preliminary Report
Committees Interview, Analyze, Develop Preliminary Reports
3.0 months
Preliminary Reports to Steering Committee
5.0 months
Committees Complete Studies
Progress Report to Commission Staff
8.0-12.0 months
Steering Committee Compiles First Draft of Final Report
Institution-Wide Review
12.5 months
Editor or Editorial Board Compiles Final Document
14.0 months
Visiting Committee Appointed by SACS
Typing and Duplication
15.0 months
Copies to:
—Board
—Administration
—Faculty
—Students
16.0 months
Preliminary Visit by Visiting Committee Chairman
16.5 months
Mail Self-Study to Visiting Committee
17.0 months
Visiting Committee on Campus
18.0 months
*Periodic progress reports should be provided to the institution

Source: SACS - Commission on Colleges, Manual for Accreditation, 1984.

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e. An institution may be requested to submit annual follow-up reports on the implementation of the team's recommendations.

f. At the midpoint of the cycle, five years after reaffirmation, an institution must submit an interim report to the Commission. The primary purpose of the interim report is to indicate any major changes affecting the institution since the last self-study.

g. Within 10 years, the process is repeated, and committees are once again formulated by the institution to prepare the comprehensive self-study.

Currently there are eleven minimum standards* with which an institution must demonstrate compliance to be accredited by the Commission on Colleges. These include:

Standard One:	Purpose
Standard Two:	Organization and Administration
Standard Three:	Educational Program
Standard Four:	Financial Resources
Standard Five:	Faculty
Standard Six:	Library
Standard Seven:	Student Development Services
Standard Eight:	Physical Resources
Standard Nine:	Special Activities
Standard Ten:	Graduate Program
Standard Eleven:	Research

The eleven standards focus on the overall achievement of an institution's unique goals. For example, under Standard Seven: Student Development Services, the following illustrations and interpretations are provided to the reader in the SACS publication entitled Standards of the College Delegate Assembly (December, 1977):

> Student development services should be directly related to the stated objectives of the institution.....The scope and structure of the administrative organization for student development services should be governed by the size, nature and complexity of the institution .....Each institution should declare those standards of behavior which it considers essential to its educational mission and its community life.....The institution is encouraged to develop effective programs of financial assistance for students who might otherwise be unable to attend college.

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*As approved in December 1984 by the College Delegate Assembly, these standards have been reorganized into Criteria for Accreditation for institutions completing the self-study in 1985-86.

In June 1984, the Board of Trustees of the Southern Association formally directed each of its Commissions to incorporate the assessment of educational outcomes, particularly student achievement, into regional accreditation criteria. By so doing, SACS Director, B. E. Childers emphasized that the additional criterion "will enlarge - not replace - our comprehensive process of accreditation. The association will promote exemplary practices for gather data on student achievement and focus attention on the benefits to member institutions of using outcomes assessment measures." A section of the Board of Trustee's statement on educational outcomes follows:

> To this end, the Association, through its commissions, is committed to:
>
> a. the development of accreditation standards and evaluation procedures which promote the systematic assessment of the outcomes of educational programs;
>
> b. the provision of resource assistance to member institutions in developing and implementing such evaluation systems;
>
> c. the identification and training of visiting committee members who can provide assistance to member institutions in measuring educational outcomes;
>
> d. the provision of leadership in communicating the positive benefits of measuring educational outcomes to member institutions through the promotion of exemplary practices and by focusing more attention on the outcomes of education as a means of further improving the quality of educational programs and services;
>
> e. the provision of leadership to states of the region to encourage and enable a systematic and cooperative approach to educational reform and improvement.
>
> --Adopted June 27, 1984
> Board of Trustees
> Southern Association of Colleges and Schools

During the past four years, the SAC's Commission on Colleges has been examining the criteria utilized for accreditation. A set of revised standards were presented to the College Delegate Assembly at their annual meeting in December 1983. The Assembly voted to delay action on the revised standards until December 1984 at which time the revised standards were approved. In 1983, the Assembly also voted to test the new standards in several institutions which were completing self-studies during 1984. Ten institutions were chosen to pilot the revised standards including Nova University and the University of Tampa in Florida. In general, the new criteria represent a reorganization of the standards which were adopted in 1977. An important addition to the criteria, however, is a new standard on institutional effectiveness which will place greater emphasis on the assessment of educational outcomes in compliance with the Board of Trustees policy statement.

Each of the 28 public community colleges and nine public universities in Florida is accredited by the SACS Commission on Colleges. In addition, 27 independent colleges and universities are accredited by this commission. In 1983, 40 institutions in Florida were accredited by the Commission on Occupational Education Institutions including 30 public and 10 independent institutions. Ten proprietary institutions in Florida are candidates for accreditation by the Commission on Occupational Education Institutions: six are licensed by the State Board of Independent Postsecondary Vocational, Technical, Trade, and Business Schools (SBIPVITTBS), three are cosmetology schools, and one is the Engineering Technical Institute of Pratt and Whitney.

Several postsecondary institutions operating in Florida are accredited by regional institutional accrediting associations other than SACS. These institutions are chartered in states outside the southeastern region, and include the Carribean Center for Advanced Studies which is accredited by the Middle States Association of Colleges and Schools, and the Golden Gate University Center and Loma Linda University Center which are accredited by the Western Association of Colleges and Schools. In addition, six institutions operating in Florida are accredited by the North Central Association of Colleges and Schools.

National Institutional Accreditation

Certain institutional accrediting bodies are national rather than regional in scope. These accrediting associations include institutions whose members are largely proprietary schools (the Association of Independent Colleges and Schools, the National Association of Trade and Technical Schools, and the National Home Study Council) and those whose members are church-related schools (American Association of Bible Colleges and the Association of Theological Schools). Each of these accrediting associations is similar to a regional association in that it accredits the entire institution; however, these national associations accredit single purpose institutions in the areas of business, technical/vocational, bible colleges and home study institutions. Proprietary postsecondary institutions have historically experienced problems with regional institutional accrediting associations and continue to turn to their own national accrediting associations for recognition and support. Most of the proprietary schools recognized by SACS are accredited by the Commission on Occupational Education Institutions rather than by the Commission on Colleges. However, COEI was not established until 1971, long after the national accrediting associations were formed for proprietary schools.

The national associations that accredit proprietary institutions do not limit their membership to schools which seek a profit. Several private, non-profit and government-sponsored institutions are accredited by these associations. These associations, however, reflect the interests of the majority of their members. For example, both the Association of Independent Colleges and Schools (AICS) and the National Association of Trade and Technical Schools (NATTS) have a unique configuration in that they are voluntary membership organizations with a mission of promoting the interest of their constituents through public relations and lobbying programs, and also, serving as institutional accreditation associations. Because of this dual (and possibly contradictory) role, some states have resisted use of AICS or NATTS accreditation for state recognition purposes. In Florida, the State Board for Independent Vocational, Technical, Trade and Business Schools recognizes both NATTS and AICS by certifying that such accredited schools "shall be presumed to be in substantial compliance with Sections 246.201-246.231, Florida Statutes." While such institutions are not exempt from licensure by this Board; the only requirement for such institutions is an initial application for licensure and an annual report to the board. Each of these national accrediting associations are recognized by the U.S. Department of Education and the Council on Postsecondary Accreditation.

Association of Independent Colleges and Schools

The Accrediting Commission of the Association of Independent Colleges and Schools (AICS) was formed in 1953 to evaluate and accredit independent institutions which offer programs in business, industry, government, or related professions. The Commission classifies the postsecondary institutions which it accredits as business and specialized schools, junior colleges and senior colleges.

In 1956, AICS was officially designated by the U.S. Commissioner of Education as a nationally recognized accrediting agency, and as an institutional accrediting agency in 1958 after it revised its criteria to include all subjects offered at an eligible institution. Over 500 business schools and colleges are accredited by AICS nationally, including 16 postsecondary institutions in Florida. The criteria used by AICS in the accreditation process include general standards in the areas of philosophy and objectives, organization and administration, financial resources, and educational activities and facilities. Additional specific criteria are provided for each of the three categories of postsecondary institutions (business and specialized schools, junior colleges, and senior colleges). The AICS accreditation procedures are similar to those used by other institutional accrediting agencies; namely, the self-study document, on-site visitation and evaluation report on a periodic basis.

National Association of Trade and Technical Schools

The National Association of Trade and Technical Schools (NATTS) was established in 1963 to accredit independent schools offering postsecondary education in trade and technical occupations. Private residential vocational schools with predominantly trade, occupational, or technical education objectives which have successfully operated for a period of at least two years are eligible to apply.

According to NATTS, accreditation "is intended to be a means of assisting good private trade and technical schools to become better schools by setting standards to which all private trade and technical schools can aspire." This association currently accredits over 600 vocational and technical schools, approximately 45 of which are in Florida.

The NATTS accreditation process and standards are similar to those of other accrediting agencies. Accreditation by NATTS is awarded for a maximum of five years.

American Association of Bible Colleges

The American Association of Bible Colleges was established in 1947 as an institutional accrediting association. The purpose of AABC accreditation is "the improvement of Biblical and church vocational programs provided in Bible colleges." Approximately 80 postsecondary institutions in the United States and Canada are accredited by AABC; seven are in Florida.

An institution must demonstrate a comprehensive bible college program and five years of operation to be eligible for AABC accreditation. A pre-membership status report, a self-evaluation report and evaluation team visitation are regular steps in the accreditation process.

National Home Study Council

The National Home Study Council (NHSC) began accrediting both degree and non-degree granting institutions in 1955. NHSC establishes educational, ethical and business standards for member schools who offer instruction through correspondence or independent study. Some schools offer programs which feature a combination of home study and resident training. Home study accreditation is defined by NHSC as "certification by a recognized body that a school has voluntarily undergone a comprehensive study and examination which has demonstrated that the school performs the functions that it claims, has set educational objectives for the students who enroll, and furnishes materials and services that enable students to meet the stated objectives."

Approximately 75 institutions are accredited by NHSC including seven in Florida. The majority of the member institutions are private home study schools; however about one-fifth of the accredited schools are public or non-profit.

Specialized Accreditation

Accrediting associations involved in specialized or programmatic accreditation evaluate a specific occupational, disciplinary or professional area within a postsecondary institution, rather than the total institution. In general, specialized accrediting associations mandate that the programs they accredit be a part of a college or university accredited by an institutional accrediting association.

The first professional accrediting association was the American Medical Association which was organized in 1847. Today, 58 specialized accrediting bodies are approved by the U.S. Department of Education and 36 of these are recognized by COPA. This discrepancy between the number of accrediting agencies recognized by the federal government and COPA is due to the fact that the federal government recognizes each of the 16 allied health committees as separate accrediting bodies. Unlike COPA, the federal government also recognizes the New York Board of Regents and certain specialized accrediting agencies which primarily focus on the accreditation of programs in secondary schools. Each of the specialized accrediting bodies is national in scope; however, the number of programs which they accredit ranges from fewer than 30 in osteopathy and chiropractic education to more than 500 in teacher education and nursing. Appendix A contains a list of specialized accrediting bodies.

Not all disciplines in postsecondary institutions have specialized accrediting bodies. For example, engineering, business, and journalism are subject to accreditation, whereas physics, mathematics, economics, and English are not. Several of the discipline areas in Colleges of Arts and Sciences are considered to be a part of the total institutional program and therefore fall under the scope of institutional accreditation. For this reason, COPA no longer recognizes the American Chemical Society as an official accrediting agency.

Thirty-five specialized accrediting agencies accredit one or more programs at Florida postsecondary institutions. The importance of and necessity for specialized accreditation varies with the program. Florida Board of Regents policy for programs in state universities states that "accreditation is essential for the viability of programs in such disciplines as engineering, architecture, law, library science; and desirable as resources become available in business, journalism and public administration." No general agreement exists on the need for seeking specialized accreditation in the area of teacher education. Only five of the 26 state-approved teacher education programs in Florida are accredited by the National Council for Accreditation of Teacher Education (NCATE). A list of accredited professional schools and specialized programs in the state university system is included in Appendix A.

Programmatic accreditation is primarily concerned with the verification of national standards which have been established for professional preparation by the professional association rather than with evaluating institutional or program performance in terms of institutional objectives. The procedures utilized by specialized accrediting bodies in evaluating programs are similar to those of institutional accrediting agencies. A self-study report of the program to be examined is submitted to the accrediting body and an on-site visitation by a team of evaluators associated with the profession follows. A few specialized accrediting agencies require an annual evaluation; however, the average length of accreditation is about five years.

Costs for Postsecondary Accreditation

A selected sample of eight public and independent institutions in Florida were asked to supply data on costs for both institutional accreditation and each of the specialized accrediting associations which accredit professional programs at these individual institutions. The institutions responding to this request included Florida State University, University of Florida, University of Central Florida, Brevard Community College, Rollins College, Lively Area Vocational Technical Center, and Tampa College.

The first five of these institutions are accredited by SACS Commission on Colleges; Lively Area Vocational Technical Center is accredited by the SACS Commission on Occupational Educational Institutions (COEI); and Tampa College is accredited by the Association of Independent Colleges and Schools (AICS). The total costs for institutional accreditation for these schools for the last year a visitation was conducted is contained on page 15. A detailed analysis of these costs is included in Appendix B. A sample of the costs for specialized accreditation at these seven institutions is also contained in Appendix B.

TABLE ONE

INSTITUTIONAL ACCREDITATION COSTS

	INSTITUTIONS						
	Univ. of Florida	Florida State Univ.	Univ. of Central Fla	Brevard Comm. College	Rollins College	Lively Vo-Tech Center	Tampa College
Total Direct Cost Reported	$83,231	$80,693	$105,460	$10,330	$22,144	$8,475	$13,516
Total Indirect Costs In Terms Of Professional Staff Hours*	5,700	3,462	5,040	2,144	350	4,500	150

*Approximately $36 per hour when calculated on the basis of the average nine-month faculty salary.

III. THE ROLE OF STATE GOVERNMENT IN INSTITUTIONAL AND PROGRAM REGULATION

State Oversight of Independent Postsecondary Education

In 1971, leaders of the independent postsecondary education sector working with the Legislature drafted a licensing law for independent institutions. The resulting legislation created the State Board of Independent Colleges and Universities and the State Board of Independent Postsecondary Vocational, Technical, Trade and Business Schools in 1974. The goal of the laws which created the two state licensing boards in Florida was to "protect the health, education and welfare of Florida citizens and to assure that degrees and diplomas issued by such schools assure a certain competency." Thus, these two boards were created in response to concern for protecting Florida citizens from unscrupulous educational entrepreneurs. The sections which follow address each of these boards.

State Board of Independent Colleges and Universities (SBICU)

The State Board of Independent Colleges and Universities consists of nine members appointed by the Governor: five educators who are selected from private colleges or universities in Florida, two educators who are selected from publicly supported community colleges or state universities, and two citizens who do not derive a majority of their income from education-related fields.

The purpose of the State Board of Independent Colleges and Universities is "to encourage privately supported higher education and to protect the integrity of degrees and diplomas conferred by privately supported colleges" (S.246.011, F.S.). The act also sets minimum legal requirements to protect individuals from deceptive, fraudulent, or substandard education, protect non-public colleges and protect the value of diplomas and degrees awarded to the citizens of Florida.

All non-public universities, colleges, and degree-granting institutions in Florida must apply for licensure or exemption from the licensing requirements. If an institution is not licensed or granted exemption, it is forbidden to operate or grant a degree in Florida. Most of the 126 independent colleges and universities in Florida are exempt from the licensing requirements. Exemptions are granted for the following types of institutions:

1. colleges chartered in Florida and accredited by an accrediting agency recognized by the U.S. Department of Education;
2. religious institutions whose purpose is missionary or ministerial training;
3. avocational institutions; and
4. institutions chartered in Florida whose credits or degrees are recognized and accepted by a minimum of three accredited institutions of higher education.

The SBICU grants three types of licenses: a "temporary license" may be granted following an on-site review by the SBICU staff, although the institution may have minor deficiencies in meeting minimum standards; a "provisional license" may be granted if, following on-site review, the institution meets required minimum standards; and an "original" license is granted upon successful completion of a review and vote of approval by the State Board. Subsequent on-site visits by the SBICU are usually conducted in conjunction with accreditation visits or upon receipt of citizen complaints.

Four types of fees are established by Section 246.101, Florida Statutes, and collected by the State Board: An initial application fee, an annual review or other renewal fee, a supplementary application fee for additional fields or courses of instruction, and an annual fee for agents representing colleges.

Thirty-three recruiting agents are licensed by the State Board of Independent Colleges and Universities. The agents complete an application requiring name, residential and business address, background training and the names of the institutions they represent.

The Board prescribes and recommends to the State Board of Education minimum standards and rules for the operation and establishment of institutions, including out-of-state accredited institutions (S.246.128,F.S.); reviews postsecondary education opportunities on military installation through the Advisory Council on Military Education; and is responsible for collecting data on independent colleges and universities.

State Board of Independent Postsecondary Vocational, Technical, Trade and Business Schools (SBIPVTTBS)

The State Board of Independent Postsecondary Vocational, Technical, Trade and Business Schools consists of nine members appointed by the Governor; one from a business school, one from a technical school, one from a home study school, two from non-public vocational and business schools, three from business and industry and one from a public school.

The purpose of the State Board of Independent Postsecondary Vocational, Technical, Trade and Business Schools is to provide the citizens of Florida protection from "deceptive, fraudulent or substandard education" in independent postsecondary vocational, technical, trade and business schools, and to protect the value of certificates, diplomas and degrees already awarded Florida citizens, by requiring these independent institutions to meet minimum educational standards for licensure (Chapter 6F, FAC). Minimum standards for licensure include statements of educational purpose and objectives, administrative staff/organizations, charters, franchises, financial statements, course and curriculum content, faculty, student services, admissions and enrollments, and publications. In addition, every postsecondary independent vocational, technical, trade or business school is required to submit ten copies of its catalog and contract for review and approval to the State Board before the initial license is granted. Subsequently each institution is reviewed by means of an annual renewal application. Any changes in catalog or contract must be submitted and approved by the Board.

The State Board of Independent Postsecondary Vocational, Technical, Trade and Business Schools currently licenses 247 private postsecondary vocational institutions. Ten institutions grant degrees as well as offering diploma/certificate programs, and 71 are accredited by an accrediting institution recognized by the Council of Postsecondary Accreditation. The SBIPVTTBS conducts on-site visits prior to initial licensure, annual renewals of licenses, or upon receipt of citizen complaints.

Five licensing fees are defined in Florida Statutes (S.246.219,F.S.): an original license application fee for each free-standing institution (branch campus or extension location), an annual renewal fee, an agent's license fee, an agent's annual renewal fee and a delinquent application fee for license renewal. In addition to licensing of institutions, the State Board licenses approximately 300 agents who solicit prospective students within the State of Florida to enroll in proprietary schools. If agents solicit in Florida they must be licensed, regardless of the school's location.

A graphic comparison of the purpose, composition, duties, and functions of the SBICU and the SBIPVTTBS is provided in Appendix C. Five institutions are licensed by both state boards. Such double licensure may occur when one institution offers both certificate/diploma programs and programs leading to an associate or higher degree requiring a certain number of credit hours in general education or liberal arts. The first type of program requires licensure by the State Board of Independent Postsecondary Vocational, Technical, Trade and Business Schools, and the degree program requires licensure by the State Board of Independent Colleges and Universities. The distinction is contained in State Board Rule 6F-3.01, FAC.

> The term 'school' is defined in Section 246.203(1), F.S. shall not include any institution that grants an associate or higher degree in which is included eighteen (18) or more quarter hours or twelve (12) or more semester hours in general education or liberal arts courses such as English literature, mathematics, psychology, sociology, chemistry, biology, music, art, religion, philosophy, etc., and which courses do not contribute to the specific specialized degree. Consistent with other laws, rules and regulations those institutions which do not grant such associate or higher degrees and which otherwise meet the definition of 'school' as set forth in Section 246.203(1), F.S., shall be under the jurisdiction of the State Board of Independent Postsecondary Vocational, Technical, Trade, and Business Schools.

Program Review

According to Florida Statute, each public postsecondary educational program must be reviewed by the appropriate postsecondary education division (Board of Regents, State Board of Community Colleges, and Division of Vocational, Community and Adult Education) on a five-year cycle. In compliance with 240.147(5) F.S., a rule (SBER 6A 10.39) was drafted by the Postsecondary Education Planning Commission (see Appendix D) and approved by the State Board of Education in November, 1984 to assure that:

a) Program reviews are conducted statewide

b) Every major program in postsecondary education is reviewed every five years

c) Budget requests reflect program review results

d) Program decisions lead to the distinctive roles established for public universities and community colleges.

State Board of Education Rule 6A 10.39 outlines a procedure by which the three postsecondary education divisions submit to the Postsecondary Education Planning Commission five-year program review plans for review and comment to the State Board. The Commission then reviews the plans in consultation with the divisions and submits an integrated five-year plan to the State Board. The last section of the rule provides a mechanism for the results of the reviews to be linked to the budgeting process. Board of Regents costs for recent program reviews are contained in Table Two.

TABLE TWO

SUS ACADEMIC PROGRAMS

STATE LEVEL PROGRAM REVIEW COSTS
1984-85

NAME	EXPENSE*	OPS**
Education	$15,600	$16,100
Physical Science	19,975	16,000
Mathematics	15,000	13,000
Law	4,700	4,200
Parks & Recreation	4,833	5,200

*Includes travel, printing, office expenses

**Consultants' honoraria

The emerging coordinated statewide program review effort will help ensure quality and be used as a means for establishing funding needs and priorities. The Master Plan for Florida Postsecondary Education recommended that, as part of the program review process, the different postsecondary education sectors define indicators for quality for each program and that these indicators form part of the criteria for evaluating programs. According to the Master Plan, the following specific criteria for program review should be included:

a) Relationship of the program to state needs and priorities as established jointly by the State Board of Education, the Legislature, and the postsecondary education community

b) Manpower needs

c) Student demands

d) Quality and characteristics of students

e) Student outcomes, including graduate follow-up results

f) Productivity of program in terms of students enrolled, graduates, or service to other programs in the institution

g) Faculty and professional staff quality and productivity

h) Instructional quality, including average class size and student-faculty ratio

i) Quality and assessibility of library resources

j) Adequacy of other resources, including equipment, space and non-academic services

k) Cost of the program, both instructional and full costs

l) Overall quality of program

m) Resource needs to accomplish specific improvements

n) Possible unnecessary duplication of programs.

Several of the program review criteria outlined above are standards utilized by the various specialized or programmatic accrediting associations to determine whether a program should be accredited. The process of program review is also quite similar to the accreditation process. For example, the Board of Regents program review process requires that an institutional self-study report be prepared on the program to be reviewed, on-site visits are conducted by a group of consultants with national prominence within the discipline under review, a consultant's report is prepared, and recommendations are made to the Board of Regents for staff analysis and implementation. The BOR review process relies heavily upon out-of-state consultants to provide recommendations to the Board as to what action may be needed to improve program quality and increase the efficiency of programs offered in the State University System. The review teams are encouraged to consider any program deficiencies which may have been noted by an external accrediting agency. In the event a program was denied accreditation by the appropriate professional accrediting organization, the reasons are examined.

Occupational Licensure and Certification

Occupational licensure in Florida is regulated by the Department of Professional Regulation in partnership with the professional boards. The boards certify the applicants for licensure, render action in disciplinary cases, promulgate rules and set the standards for their profession. Almost one-third of the persons involved in licensing and regulating of Florida's professionals are board members appointed by the Governor to serve on the individual professional boards. The membership is a mix of both professional and consumer members. Most health care and building industry professions are regulated by the Department of Professional Regulation, however a few professions such as laboratory, emergency medical and midwifery are licensed by the Department of Health and Rehabilitative Services. A complete list of professions regulated by the Department of Professional Regulation is contained in Table Three.

Professional regulation in several states, including Florida and in several professions requires that a preparatory program be accredited by a specialized accrediting body before program graduates can be granted occupational licensure or certification by the state. Information was received from the Department of Professional Regulation as to which licensed professions in Florida require graduation from an accredited program for state licensure in that occupation. These professions are identified in Table Three. The 1982 Carnegie Foundation report entitled The Control of the Campus recommended that state governments re-examine the linkage between specialized accreditation and professional licensing by the State. The report cited at least twenty-one specialized accrediting bodies which are tied to professional licensing, and charged that

> through such arrangements, specialized accrediting associations wield enormous power over higher education by controlling entry into the profession, and giving states strong influence over academic matters. The role of the state in occupational licensing should be to certify results, not control the process of education. (p. 79)

Teacher Certification and Program Approval

The Department of Education is responsible for the certification of teachers in Florida. Section 231.02, F.S., provides that ". . . . to be eligible for appointment in any position in any district school system, a person shall be of good moral character . . . . and shall, when required by law, hold a certificate or license issued under regulations of the State Board of Education." The State Board of Education is authorized under Section 231.15, F.S., to develop rules by which regular temporary, part-time and substitute teaching certificates are issued. The Education Standards Commission recommends rules to the State Board of Education for adoption, which relate to programs and policies for the certification, certification extension, improvement, development, and maintenance of competencies of education personnel.

Teacher education programs in Colleges of Education in Florida are not required to be accredited by the specialized accrediting agency (NCATE) for the graduates

TABLE THREE

PROFESSIONALS LICENSED AND REGULATED BY THE DEPARTMENT OF PROFESSIONAL REGULATION

- Accountants (C.P.A.)*
- Acupuncturists
- Architects*
- Barbers
- Chiropractors*
- Clinical Social Workers*
- Construction Contractors
- Cosmetologists
- Dentists*
- Dental Hygienists
- Electrical Contractors
- Engineers*
- Funeral Directors and Embalmers
- Landscape Architects*
- Land Surveyors
- Marriage & Family Therapists*
- Masseurs/Masseuses
- Medical Technicians
- Mental Health Counselors*
- Naturopaths
- Nurses*
- Nursing Home Administrators
- Opticians*
- Optometrists*
- Osteopathic Physicians*
- Physical/Occupational Therapists*
- Physicians*
- Pharmacists*
- Podiatrists*
- Port Pilots
- Psychologists*
- Real Estate Agents
- Veterinarians*

*Those professions which require graduation from an accredited program.

to be certified by the State. State Board of Education Rules currently provide two different processes by which institutions can comply with state requirements for certification of their graduates. In the first process, institutions submit courses to the Department of Education for acceptance to meet the individual course requirements prescribed in State Board of Education Rule 6A-4, FAC, for various certification specializations. The second process is one in which a teacher training institution may acquire state program approval status as prescribed in Rule 6A-5, FAC. This process requires that Colleges of Education design and document a complete teacher training program with admission, screening and graduation requirements specified. A curriculum designed to include Florida's generic teaching competencies must be verified and a responsiveness to the educational needs of Florida's school districts must be an integral part of the program. In addition, there must be evaluation procedures specified in the program for determining that graduates have satisfactorily demonstrated all required competencies. According to Rule 6A-5, FAC, the purposes of program approval are to make teacher preparation programs responsive to the educational needs of Florida, to recognize institutions with a serious commitment to quality in teacher education, to encourage flexibility in teacher education program design, to make more effective use of resources and to encourage teacher education as a career-long process.

Institutions seeking state program approval for their teacher education program must complete a self-study report according to criteria specified by the Department of Education. An evaluation team is selected which is composed of representatives from universities, school districts and the state agency. This team then conducts the on-site visit through which program approval or non-approval is determined.

Program approval status, which is awarded only to programs for which certification coverage is available, provides graduates of approved programs with the assurance that they have met training requirements for certification. Successful completion of an approved teacher education program entitles an individual to be granted the comparable certification in approximately 35 other states that have signed the Interstate Certification Agreement with Florida. Through the Interstate Agreement, determination of qualifications by another participating state need not be re-examined each time the applicant presents credentials for a job as a teacher. The Interstate Certification Agreement assures enough similarity in teacher preparatory programs, qualifications, and any other elements of eligibility for certification that a state is justified in accepting either a candidate for certification or a certified teacher from another participating state without an elaborate inspection process.

Legislative staff are currently conducting a review of teacher certification since the statutes governing this state regulatory process will sunset in 1985. Many reforms in the present system are proposed and several changes in teacher certification in Florida are expected as the result of this legislative review process and the discontent with traditional preservice education programs. The alternate certification program for secondary education enacted by the 1984 Legislature set an important precedent in recognizing paths to teacher competence and certification other than traditional teacher education courses. Several school districts also utilize a non-traditional approach to certification for their non-degree vocational education instructors by offering special training programs within the district through which state certification is granted.

Relationship of State Regulation to Accreditation

Florida's requirements in institutional and program regulation were described in the last section. In Florida there has been little collaboration between accrediting associations and the State's higher education agencies. State institutional programs and private institutional programs which receive state funds are held accountable to the State through the program review process.

Independent institutions are accountable through the licensing procedures of the two state boards for independent postsecondary institutions. All public colleges and universities and most independent colleges and universities are institutionally accredited by SACS. State Board Rule 6C-3.06 states that "the Board of Regents shall be notified by the President of a university at the time an accreditation visit is requested, and accreditation reports and supporting data shall be filed with the Chancellor promptly upon receipt by the institution." Unaccredited independent institutions operating in Florida are not required to seek accreditation as a condition for continued licensure.

The necessity for specialized accreditation varies among programs. Some programs require graduation from a program which is accredited by a specialized accrediting association for professional licensure. These same programs continue to be monitored by the State through the program review process. Separate and uncoordinated self-studies and visitations are frequently conducted for both processes.

A few states have developed or are in the process of developing linkages between the state agency and accrediting association. For example, since 1977, the Middle States Commission on Higher Education and the Maryland Board of Higher Education have had a joint agreement which provides for collaborative visits to public institutions in Maryland and specifies particular areas of responsibility. The self-study serves both state and institutional needs as well as accreditation requirements. In California, the Western Association and the California Community College System currently have a FIPSE grant to explore ways in which the self-study, program review and statewide planning processes can be utilized together to reinforce each other. A study report in this project is expected in June 1985. In a survey recently completed by the Commission, no southern states were identified as having developed a cooperative agreement with SACS.

The Council on Postsecondary Accreditation has suggested several steps which could be taken by accrediting associations and states to reinforce each other in their mutual concern for quality preservation and enhancement:

1. Far more effective communication on a continuing basis needs to be developed between states and accrediting associations.

2. Such communication should include clearer identification of functions and areas of complementation and mutual concern.

3. Accrediting associations should recognize more clearly than sometimes has been the case the relations of public institutions to systems of which they are a part and the relation of institutional objectives to state objectives, including the state responsibility for determining role and scope.

4. States and institutions should explore the possibility of utilizing the institutional self-studies required by accrediting associations as vehicles for internal institutional program review and as integral to on-going institutional and statewide planning.

5. Where feasible states and accrediting associations should develop cooperative agreements in relation to quality review of public institutions such as currently exist with Middle States and Maryland.

6. Within the framework of institutional role and scope and resources available, states should respect and reinforce institutional self-regulation and encourage effective institutional participation in the communal self-regulatory means of quality assessment which is accreditation.

Several strategies for minimizing duplication in accreditation and state regulation were explored during the course of this study. These will be presented in Section D of the next chapter.

IV. ISSUES AND RECOMMENDATIONS

A. Feasibility of a State System of Postsecondary Accreditation

After analyzing the issues and implications involved in withdrawal from regional and specialized accrediting associations, the Commission has concluded that it is not desirable for Florida as a single state to implement a process of accreditation, a phenomenon which is regional and national in its organization and impact. The privileges to which accreditation by a recognized accrediting agency entitles an institution and its students are many--accreditation accords eligibility for federal and certain private foundation funds to the institutions and for students in attendance to receive federal and state financial aid. Transfer of student credits between institutions and entry to the next level of schooling is usually contingent upon attendance or graduation from an accredited institution. Eligibility for entering into most professions is dependent upon accreditation as graduation from an accredited program is required frequently for occupational licensure. As of September 1984, individuals seeking employment with the State in job classes for which a college degree is necessary must have graduated from an institution which is accredited by one of the six regional accrediting agencies or the Association of Independent Colleges and Schools (AICS).

A survey conducted by the Commission as to policies in other states regarding accreditation revealed that some states used the term "state accreditation" synonymously with institutional licensure or state authorization (see Appendix F). However, only one state, New York, now has a process of accreditation for all postsecondary institutions and programs. The Board of Regents of the State of New York established the accreditation process in 1787, long before the emergence of regional and specialized accrediting agencies, and the New York Board of Regents is recognized by the U.S. Department of Education as an official accrediting association. Accreditation by the State of New York has not eliminated specialized or regional accreditation, as most postsecondary institutions and programs in New York are accredited by the Middle States Association and the appropriate specialized accrediting association as well as the State. Thus postsecondary institutions and programs in New York still feel compelled to acquire regional and specialized accreditation for the institution as a whole and each of its separate programs.

In public testimony received by the Commission, state officials and institutional representatives unanimously opposed the establishment of a state system of postsecondary accreditation. Reasons given included those cited above as well as the necessity to minimize additional costly reporting efforts, to avoid placing accreditation in a position susceptible to the political pressures found in a single state, and to maintain a voluntary, democratic peer-review process which supports long-term goals and commitment to institutional quality and stability. Furthermore, it is doubtful whether Florida institutions would ever consider the termination of their current voluntary accreditation practices if a state system were established.

Previous efforts by states other than New York to operate state accreditation have proven unsatisfactory and have been abandoned. For example, state accreditation for public K-12 institutions and community colleges in Florida was abolished in the early 1970s due to the burdens of paperwork and time, and the high degree of similarity with SACS standards and procedures. State accreditation of the North Carolina Community College System was tried for a few years and eliminated in 1977. Similar efforts by other states have been abandoned.

The Commission concludes that the State of Florida should continue to recognize the self-regulatory process of accreditation as one method of attempting to address minimum quality standards for postsecondary education in Florida. Other processes for monitoring and insuring quality such as licensure and program review should also be continued and promoted by the State. The possibility for cooperative agreements between state agencies and independent accrediting associations such as those being implemented in Maryland and California in the community college sector should be examined and will be discussed separately in the pages which follow.

Recommendation:

The establishment of a state system of postsecondary accreditation as an alternative or supplement to the regional and specialized accrediting processes is neither feasible nor desirable. Instead, attention should be focused on causing changes and improvements in the current accrediting structures and procedures. Closer working relationships should be developed between these accreditation processes and the State licensure and program review functions.

B. Regional Accreditation of Florida Postsecondary Education Institutions

The Commission on Colleges of the Southern Association of Colleges and Schools

Emphasizing Quality in Accreditation Standards

Regional accreditation for colleges and universities in Florida is based upon the criteria of the SACS Commission on Colleges. These criteria together with a manual of instruction constitute the guidelines for an institutional self-study which results in a written document. The self-study is followed by an inspection performed by a visiting team selected by the Southern Association. The visiting team uses the self-study as a starting point for its inspection of the institution.

An examination of the current SACS criteria utilized by the Commission on Colleges reveals that these standards fail to control quality. They are not quantified and focus on the unique goals of the institution being studied and the processes used to achieve them. For example, under Standard Six, Library, the following guidelines are provided. ". . . Each library must have basic resources to support the institution's purpose and programs. Such resources should be available in a well-equipped facility which will encourage maximum utilization by the campus community." The lack of minimum quantified standards for institutions to receive or maintain accreditation results in a subjective judgement by the visitation team as to the appropriateness of institutional goals and the manner in which resources are used as well as their adequacy. The focus upon process and the lack of specific criteria has led to results that are sometimes bewildering in that criticism seems to ignore the quality and educational achievements of institutions.

As a consequence, the call for reform and the use of outcome measures in accreditation has increased. In October 1984, the National Institute of Education released a report on the Conditions of Excellence in American Higher Education as a companion to A Nation at Risk, the recent report on the condition of elementary and secondary education in the United States. The report, entitled Involvement in Learning: Realizing the Potential of American Higher Education, recommended that "accrediting agencies hold colleges, community colleges, and universities accountable for clear statements of expectations for student learning, appropriate assessment programs to determine whether those expectations are being met, and systematic efforts to improve learning as the result of those assessments."

In his December 1983 address at the annual meeting of the Southern Association of Colleges and Schools, Florida Governor Bob Graham charged that Florida is setting standards higher and more rigorous than those of the Southern Association, and Florida is providing the funds needed to meet these more rigorous standards. By calling for a measurement of the products of the educational experience through product-oriented standards, the Governor strongly encouraged SACS to improve its evaluation process to become more responsive to the quality improvement goals of the Southern states.

Several participants at the November 7th public meeting of the Commission supported the Governor's concerns and described the numerous measures Florida has taken to ensure quality and outcomes assessment. State officials emphasized that accreditation must incorporate outcomes standards to ensure institutional quality.

In response to mounting public concern about process-oriented standards which are not quantified, the SACS Commission on Colleges initiated a study of their current standards in 1981, and proposed a revised set of standards to the College Delegate Assembly. After several years of debate, the revised set of standards passed at the annual meeting of the Southern Association in December 1984. In addition to minor revisions in the current set of standards, a new standard was added--an outcomes assessment criterion on institutional effectiveness which focuses on the evaluation of the product of the educational experience. The revised standards were field-tested at 35 Southern institutions including Nova University and the University of Tampa in Florida which conducted the self-study process during Fall 1984.

The guidelines provided by the Commission on Colleges for the new standard "prescribes no single procedure or set of procedures for use by the institution and recognizes that an effective program to evaluate institutional effectiveness will usually require and use a variety of procedures." Some of the new procedures suggested for measuring institutional effectiveness include peer evaluation of programs, structured interviews with graduates, pre-testing and post-testing of students, performance of graduates on licensure examinations, and placement rates of graduates.

The Commission endorsed the then proposed standards at the November 7th public meeting as a significant first step by SACS to develop a more comprehensive approach to the accreditation process and to be more responsive to needs of the higher education community. However, the Commission cautioned that because of the broad general language in which the revised standards are couched, they can only serve as guideposts and their meaningful administration and interpretation was essential.

Recommendation:

In an effort to strengthen the standards utilized by the SACS Commission on Colleges, the Florida Commissioners on the SACS Commission on Colleges should carefully monitor the timely implementation of the revised set of standards, especially the product-oriented, quantifiable criterion on institutional effectiveness. A progress report on the implementation efforts should be provided by the Florida Commissioners on SACS to the Postsecondary Education Planning Commission by June 1986.

An Alteration in Regional Accreditation--Self-Study and Visitation by Exception

The Commission's analysis of the accreditation process reveals substantial duplication and enormous costs. In large complex universities, the visitation team can have 30 members or more since one member may be assigned for each organizational and program area. The required accreditation cycle for membership in SACS is ten years, after the first five-year reaffirmation visit. Large universities may divert hundreds of thousands of dollars every ten years and several hundred manhours to complete the cyclic self-study and visitation. Although smaller institutions do not divert as much in direct costs, the fiscal impact may be proportionately greater, and as a minimum, is of significance to the institution's budget. Testimony from institutional representatives indicated that benefits flowing from the self-study, visitation and subsequent reports did not justify the money and time involved.

Several institutional administrators testified at the public meeting that the elaborate self-study is quickly outdated, frequently read only by members of the visitation team, expensive in terms of direct costs and time involved, and the entire exercise is not considered beneficial or useful when the possibility for disaccreditation or probational status is extremely remote.

A number of possibilities for eliminating expenses and duplication were explored. One approach currently used by the Southern Association is to permit well-established institutions, which have successfully completed at least one comprehensive visitation and have an on-going system for institutional planning and evaluation, to complete a special self-study. The special self-study examines one or more problems identified as pertinent to a portion of the institution rather than the institution as a whole; for example, the modification of an educational program or college within a large university. Institutional costs for the special self-study were obtained from the University of Florida and Florida State University. Officials at these universities reported that the direct costs for the 1983-84 special self-studies were approximately $83,000 and $80,700 respectively. In addition, approximately 3500 professional manhours were needed at Florida State and 5700 at the University of Florida to complete the accreditation self-study and visitation cycle. University administrators stated that the direct costs for SACS accreditation were not reduced significantly as the result of the alternative self-study approach being promoted by the Southern Association.

Institutions which have completed a number of successful visitations over a period of two or more decades could be exempt from the periodic self-studies and cyclic visitations if they provide SACS with annual reports consisting of quantified data. This monitoring device through the use of such information as faculty/student ratio, admission practices, and library acquisitions could reveal deterioration in quality of an institution's condition. Ten to twenty quantifiable measures that every college or university can easily produce might be acceptable for this purpose. Most institutions of higher education now maintain such information for several reasons. The Board of Regents, the State Board of Independent Colleges and Universities, the Governor's Office or the State Legislature may request such figures, or the university may require them for internal governance or for the allocation of funds. SACS could also be sent the reports of professional accrediting associations, the results of the State's comprehensive program review processes, and other supportive documents. If an institution can provide evidence that it has continued to meet its standards of quality since the last accreditation cycle, then there would exist no reason to require completion of a self-study and visitation by a large evaluation team. SACS would require these currently burdensome and relatively non-productive activities only if a deterioration in quality was noted at the institution.

SACS now requires annual reports from its members containing some of the information likely to be included in any monitoring system. However, the current annual report primarily focuses on implementation of the visiting team recommendations. Thus some modification is warranted so that the annual report would be more quantifiable to implement the proposal. The new standard on institutional effectiveness will require an institution to maintain the kinds of information likely to be determined by SACS as essential to the recommended monitoring system.

The annual monitoring report being proposed can be facilitated if SACS adopts the Common Language for Postsecondary Accreditation which was recently developed by COPA through a contract with the National Center for Higher Education Management Systems. Through the use of this common language, COPA is attempting to standardize a quantitatively-oriented annual reporting system for both institutional and specialized accreditation. This handbook has the potential for becoming a reporting device for the submission of quantitative data on an annual basis by an institution to its accrediting body. COPA, however, does not now have the authority to impose the use of the data system upon an accrediting association.

In suggesting the visitation by exception process, the Commission recognizes that an institution should continue to have the option for a comprehensive self-study or special self-study and visitation, if it believes that a self-study and visitation will be beneficial.

Recommendation:

The accreditation process should be modified to permit institutions which have successfully completed a number of comprehensive accreditation cycles, and have provided accurate and appropriate annual monitoring reports to the Commission on Colleges, to participate in a self-study and visitation by exception option. If an institution provides evidence that it is meeting minimum standards of quality, then it can choose to be exempt from the mandatory self-study and visitation cycle. If deterioration in quality is noted, the Southern Association should require an immediate self-study and visitation. To facilitate the implementation of the recommended monitoring system, SACS should adopt COPA's Common Language for Postsecondary Accreditation.

Modifications Affecting the Visitation Team

Part of the displeasure with accreditation concerns the visitation team. First, the Commission was made aware of charges that institutional leaders and senior officials generally do not serve on the visitation teams, and often when a major university is visited, administrators or experienced faculty from comparable institutions do not participate on the team. The Carnegie Foundation report, The Control of the Campus, stated that "Accreditation is often little more than an empty ritual . . . Higher education leaders frequently decline to participate in the process." Institutional leaders have responded to this criticism by stating that the visitation is a time-consuming process which takes several days to complete and is of little value. The change being proposed by the Commission for a non-cyclic visitation by exception should provide for a more constructive and meaningful visitation experience.

Another criticism of the regional visitation team is that inexperienced members have not been given adequate orientation or training by the Southern Association. Consequently, the visitation has become more of a learning process for team members than an evaluation of the institution being visited. Because of this lack of training as well as lack of administrative experience, institutional administrators have complained of subjectivity in the visitation team's report and problems which have resulted from differences in philosophy between the host institution and the institutions represented by visitation team members.

Regional accreditation visitation teams in Florida have not had the participation from the respective state boards. Board of Regents staff have been present at team exit interviews at state universities, but their involvement during the visitation has been limited. In Maryland, the State Board of Higher Education assigns up to three persons to work with regional accreditation visitation teams to public institutions in the state. This cooperative agreement between the Maryland State Board for Higher Education and the Commission on Higher Education of the Middle States Association of Colleges and Schools has been in operation since 1979 and has helped to reduce duplication between state and accreditation requirements for public institutions in Maryland. The agreement also provides a vehicle for the state board and the accrediting association to work cooperatively in the evaluation and accreditation of colleges and universities. A similar approach is currently being considered between the California Community College System and the Western Association of Colleges and Schools.

Recommendation:

1. The Board of Regents, the State Board of Community Colleges, the State Board of Independent Colleges and Universities, and the Independent Colleges and Universities of Florida (ICUF) should reinforce the efforts of the Southern Association by setting policy which indicates that public service efforts by institutional leaders and senior officials in Florida's public and private higher educational institutions include participation periodically on a visitation team.

2. SACS should institute a system of selection to ensure a broad participation of institutional representatives in the process. Team members should be chosen who have the background and experiences relevant to the size and complexity of the institution being visited. When inexperienced or non-administrative faculty are chosen for membership on a visitation team, SACS should provide adequate training to these novice members.

3. The Board of Regents, the State Board of Community Colleges, and the State Board of Independent Colleges and Universities should examine the possibility for cooperative agreements with the Southern Association which would include state board representatives assisting with accreditation team visits to institutions of higher education in Florida.

The Commission on Occupational Education Institutions of the Southern Association of Colleges and Schools

The Commission on Occupational Education Institutions (COEI) of the Southern Association was created in 1971 to accredit non-degree granting postsecondary institutions including vocational, technical, trade, and business schools. An occupational education institution is defined by SACS as "one that has as its major purpose the preparation of individuals for employment in jobs." The Southern and New England Associations are the only two regional accrediting agencies which maintain separate commissions for the accreditation of these non-degree postsecondary institutions.

The COEI governance structure consists of 19 members including two representatives from business and industry. The philosophy of COEI emphasizes that the quality of occupational education must be tied directly to the abilities and the employability of students and graduates. To this end, COEI accreditation has continued to secure the meaningful involvement of representatives of business and industry. In addition to having business and industry representation on the Commission, a Business-Industry Advisory Board has been formed to "advise the Commission on public information, methods of financing, projected regional industrial expansion and education needs and to provide a method for the identification of areas needing specific research, development, and emphasis in the field of occupational education." This advisory board consists of key officials from corporations and labor operating in the Southeast.

The standards of the Commission on Occupational Education Institutions have undergone continuous revision and improvement since they were created in 1971. One reason for this responsiveness to change is that the governance structure of COEI is small and manageable. Unlike the 66 member Commission on Colleges where modifications in procedures and policy have required several years, COEI's philosophy has been one of continual adjustment so that "outdated programs can be supplanted by programs of occupational education relevant to our times and to the needs of business and industry."

Vocational education administrators in Florida have confirmed that the five-year accreditation cycle of COEI is appropriate since occupational education must respond to the needs of a rapidly changing technological society. The self-study serves as a valuable tool for vocational education centers and other occupational education institutions in the process of evaluation and planning so that the continual updating of instructional services and curricula can occur. Testimony given at the public meeting as to costs and benefits of the visitation stipulated that the costs were reasonable in relationship to the benefits received. Vocational education centers accredited by COEI in Florida spend less than $5,000 a year for accreditation. Testimony was also given that the suggestions and recommendations of the visitation team were valuable to the institutions as they plan for improvements in the quality of services offered. There appears to be little duplication between the State's program review process which focuses on single programs, and COEI standards which focus on the total institution.

As previously stated, one criticism of the current standards utilized by the SACS Commission on Colleges is that these standards are not quantified; they focus on the unique goals of the institution being studied and the process and use of resources to achieve them. This same criticism cannot be made of COEI standards. The 1983 edition of the Policies and Standards of the Commission on Occupational Education Institutions and the 1984 edition of The Self-Study Manual repeatedly highlight product-oriented measures of evaluation. For example, under "Standard 4; Educational Programs" the following guidelines and directives are provided to the institution completing the self-study:

-- Show evidence that the occupational programs are planned to meet the industrial needs of the institution's labor market.

-- What measures have been used, are currently being used, or are contemplated for the evaluation of program effectiveness? (If institution-wide tests have been administered to graduates, tabulate the scores by range, median, and percentile using suitable norms.)

-- What procedure is followed to insure systematic evaluation of student achievement?

-- What evidence is available on how well students who participated in this program perform after leaving school?

The SACS Commission on Occupational Education Institutions is to be commended for providing a good example of appropriate measures of performance as a basis for accreditation. The small and flexible governance structure characterized by its responsiveness to change, quantified standards, reasonable institutional costs for accreditation, and beneficial visitations conducted by small effective teams have resulted in an accreditation process which appears to be acceptable and desirable to member institutions in Florida.

One concern regarding COEI accreditation was noted by the Commission. In Florida, postsecondary vocational technical centers operated by school districts are accredited by the SACS Commission on Occupational Education Institutions while those under the administration of community colleges are accredited by the SACS Commission on Colleges. The occupational education programs at these degree-granting institutions have not been subjected to the quantified COEI standards in the self-study and visitation process.

Recommendation:

The COEI standards should be incorporated into those utilized by the Commission on Colleges when the occupational education program is accredited as a part of the accreditation process for a degree-granting institution. COEI and the Commission on Colleges should ensure representation of both types of institutions on the visiting team when an occupational education program is within the community college being accredited.

C. Curtailing the Power and Growth of Specialized Accrediting Agencies in Florida

In recent years, criticisms of specialized accreditation processes and procedures both nationally and in Florida have increased dramatically. These professional accrediting associations have grown in power and number, and in many cases, have placed highly restrictive requirements on institutions. The primary impetus for this growth in power is the linkage between the accrediting association and the state process of professional licensure.

Accreditation is often defined as a voluntary process of self-regulation. However, because of the frequently mandatory linkage between specialized accreditation and occupational licensure, the process of accreditation can no longer be depicted as voluntary. In The Control of the Campus, at least 21 specialized accrediting associations were identified as being tied to the State in the occupational licensure process. Of the 33 professional groups regulated by the Department of Professional Regulation in Florida, 19 require that individuals graduate from an accredited program to be eligible to sit for the state examination and obtain a professional license to practice in Florida. These professions are listed in Table Three on page 22. The Department of Health and Rehabilitative Services also imposes this same requirement for x-ray technicians, emergency medical technicians, and other allied health professionals which it licenses.

The linkage with the State through the licensing process has given specialized accrediting agencies the power to impose extensive requirements on institutions. In this relationship, additional requirements may be placed on an institution to meet professional standards and the institution must comply, since loss of accreditation would result in program graduates being unable to obtain a state license to practice in the profession. Consequently, professional accrediting standards have steadily become more restrictive and demanding. Examples of the restrictive standards imposed on institutions by specialized accrediting boards were contained in The Control of the Campus. The American Assembly of Collegiate Schools of Business defines the advanced degrees faculty must have as part of its accreditation requirements. Several of the specialized accrediting boards such as the American Occupational Therapy Association and the Committee on Allied Health Education and Accreditation (CAHEA) must approve the appointment of a new program director at every institution they accredit. Directors of allied health and other programs view themselves as handicapped by such unreasonable standards and believe that the appointment of a director is the responsibility of institutional administrators and not the specialized accrediting agency.

In many professional programs, general education requirements have been reduced or the length of time for a student to complete a professional preparation program has increased due to the pressure of the accrediting group. Pharmacy and engineering are examples of programs which now require five or six years to complete due to requirements of accrediting groups rather than voluntary internal university decisions. The power once exerted by institutional administrators in these programs has been reduced significantly. Furthermore, the State's taxpayers must pay for these extended programs and have had no choice in the formulation of the additional requirements.

COPA is working to change what it considers to be unduly rigid and over-quantitative requirements. For example, the American Bar Association recently eliminated its requirements that a law school maintain a separate library. One procedure utilized by COPA to ensure some balance to the professional perspective is to require that all recognized accrediting boards and commissions have public members. Almost all such boards have a minimum of two lay members and many have three or more.

Another requirement for membership in COPA for a professional association is that the organization recognize the importance of general education in addition to the professional preparatory program. However, pressure for additional specialization has come from program faculty as frequently as from the accrediting group. Alleviation of the problem of excessive control by an accrediting body is not easy, but some progress is being made.

The proliferation and subdivision of specialized accrediting bodies have augmented the problem. Smaller and newer fields of specialization view professional accreditation as important to securing visibility and acceptance, and as a method of enhancing the status of the profession. Accreditation is also an important first step in the process of controlling admission to the profession at the state level through occupational licensure. The number of specialized accrediting bodies has gone from a small core in business, medicine and engineering, to 36 agencies which are recognized by COPA. Although only a few have been added in recent years, several organizations are now negotiating with COPA to establish their own recognized accreditation structure. The number of accrediting agencies requesting recognition by COPA is nearly double the number of existing specialized accrediting bodies currently recognized. Although COPA has been reluctant to increase the number of accrediting agencies it recognizes, the pressure on COPA for additional recognition is enormous and will undoubtedly result.

University and college presidents in Florida, especially those on campuses with graduate programs and professional schools, express concern about the potential proliferation of these bodies. They have charged that the growth of specialized accrediting agencies threatens the autonomy of institutions through the imposition of restrictive requirements. Testimony at the Commission's public meeting indicated that proliferation in part may result from institutional administrators allowing accrediting bodies which are not members in COPA onto their campuses. COPA must be identified as the official umbrella organization for specialized agencies; accrediting bodies not recognized by COPA should be allowed to evaluate Florida's institutional programs only after careful evaluation by the institution.

An important aspect of the proliferation issue is the subdivision within specialized accrediting agencies. Probably the greatest example of this is the Committee on Allied Health Education and Accreditation (CAHEA) which was established in 1976 and is recognized by COPA as one of the official 36 accrediting bodies. CAHEA now has 16 review committees or boards which accredit programs in 23 separate areas of allied health. Each allied health program must be reviewed independently by individuals representing professional organizations of the specific allied health academic program. COPA not only recognizes the parent agency of CAHEA but also it has approved the separate accreditation processes for 23 allied health programs within CAHEA.

Professions regulated by the Department of Professional Regulation fall into three categories with regard to the type of licensing examination administered. Some professions require a state examination, others a national examination and some professions require both. These are contained in Table Four. Professions which require either a national examination, or a state and national examination, and also require graduation from a professionally accredited program such as accounting, nursing, and chiropractic should be examined by the Department of Professional Regulation to determine whether the state requirement that graduation from an accredited program is essential for occupational licensure, is indeed appropriate. If the national or state examinations are strong safeguards to protect against granting licenses to candidates who lack the requisite knowledge and skills, then graduation from a program which is accredited by a professional accrediting board may not be a necessary requirement.

Recommendations:

1. The Department of Professional Regulation should examine the linkage between specialized accreditation and occupational licensure. In certain professions when sufficient state control for quality assurance already exists (e.g. national examinations, practical experience) and there is no legislative authority which requires graduation from an accredited program, the Department of Professional Regulation should consider the deletion of the requirement that applicants for an occupational license to practice in Florida must have graduated from an accredited program. In professions in which Florida Statute requires an applicant to have graduated from an accredited program, the Legislature should consider modification in the statute if sufficient quality control measures exist.

2. The practice of imposing unnecessary or restrictive standards on institutional programs should be curtailed. The Postsecondary Education Planning Commission should endorse the COPA policy for adding lay members to professional accrediting boards and other actions which curtail the intrusive standards placed on institutions by specialized accrediting associations. In addition, the Commission should endorse the COPA membership requirement which ensures that each of the recognized specialized accrediting associations supports a requirement for general education.

3. The Board of Regents and State Board of Community Colleges should adopt a policy which discourages any specialized accrediting agency not recognized by COPA from being represented on campus. COPA should continue to restrict the proliferation of specialized accrediting agencies, especially the unwarranted proliferation of accrediting committees under the umbrella of the recognized agency. The Postsecondary Education Planning Commission encourages COPA to adopt a policy which emphasizes that all self-studies and visits should be coordinated and consolidated by the parent accrediting agency. In its 1985 study of allied health programs in Florida, the Postsecondary Education Planning Commission should address the concerns expressed by allied health program administrators regarding the proliferation of independent accrediting committees under the umbrella of CAHEA.

TABLE FOUR

PROFESSIONS LICENSED AND REGULATED BY THE DEPARTMENT OF PROFESSIONAL REGULATION

NATIONAL EXAMINATION REQUIRED	STATE EXAMINATION REQUIRED	STATE AND NATIONAL EXAMINATION REQUIRED
Accountants	Acupuncturists	Chiropractors
Architects	Barbers	Cosmetologists
Clinical Social Workers	Construction Contractors	Dentists
Engineers	Direct Disposers	Dental Hygenists
Mental Health Counselors	Electrical Contractors	Funeral Directors and Embalmers
Nurses	Emergency Medical Technicians	Landscape Architects
Osteopathic Physicians	Harbor Pilots	Land Surveyors
Physicians	Hearing Aid Specialists	Nursing Home Administrators
Physical Therapists	Marriage and Family Therapists	Opticians
	Massage	Optometrists
	Paramedics	Pharmacists
	Podiatrists	Psychologists
	Real Estate	Veterinarians
	School Psychologists	

Source: Department of Professional Regulation, January 1985

D. Minimizing Duplication in Accreditation and Program Review

One of the major institutional complaints regarding both regional and specialized accreditation is that an individual institution is constantly under investigation by one or another specialized accrediting group. For example, Florida State University which is involved with 19 specialized accrediting associations and the SACS Commission on Colleges reported that in 1982-83, five specialized accrediting associations and the regional association conducted separate on-site visitations to the institution. The problem is compounded at the University of Florida, where 31 specialized accrediting agencies conduct on-site visitations on campus.

Visitations by specialized accrediting agencies generally occur every five years; however, some accrediting groups evaluate on a two-year cycle and others on a ten-year cycle. Independent, uncoordinated reviews by so many different specialized accrediting associations are expensive, time consuming and to some extent duplicative of each other. The average direct cost of a specialized accreditation visit is $2000; however, the indirect costs in terms of professional and support staff time far exceeds the direct costs. Since 1980, COPA has encouraged interagency cooperation in accreditation and has developed guidelines for this purpose. These guidelines promote cooperative agreements between institutional and specialized accrediting agencies, and among various specialized accrediting agencies. The guidelines for cooperation address the following (COPA, 1980):

- the importance of institutional leadership in promoting cooperation among accrediting agencies,
- the necessity for a written agreement among the agencies,
- the designation of accrediting responsibilities,
- the accreditation standards or criteria which will apply under the collaborative agreement,
- procedures for contracting with the institution to arrange for cooperative accreditation visits,
- alternatives/options for the self-study,
- composition of the visiting team and responsibilities during the on-site visit, and
- the determination of fees and other finances which facilitate reduction in institutional costs.

As a part of the Commission's survey of Florida postsecondary institutions, selected private and public colleges and universities were asked if any attempts had been made to coordinate or consolidate the visits of various accrediting associations. All but one institution, Brevard Community College, responded that no such attempt had been made. The vice-president for academic affairs at Brevard Community College stated that the institution has attempted to coordinate the activities for the various specialized accrediting agencies, but with very little success.

The lack of cooperative visitations promoted by Florida institutions is consistent with the results of other studies. For example, a COPA-sponsored national study on institutional views on cooperation among accrediting agencies concluded that although most institutional and program administrators wanted to participate in future cooperative endeavors because of such benefits as coordinated self-studies and reduction in costs, cooperative interagency activities are infrequent.

It should be recognized that the Commission is not proposing coordinated reviews for all professions. For example, there would be little to be gained by a joint visitation to accredit both the law and engineering programs simultaneously. However, in some other areas, such as health related programs, the possibilities for combined visits are worth exploring.

Certain regional accrediting agencies have attempted to coordinate site visits with one or more specialized accrediting agency at the request of a specific postsecondary institution. SACS guidelines to member institutions stipulate that coordinated visits are feasible. At the Commission's public meeting, SACS Executive Director Bob Childers stated that the Commission on Colleges has conducted joint visitations with specialized accrediting bodies when the institution being evaluated has requested concurrent visits; however, these have occurred infrequently.

Two hurdles must be overcome if cooperative visits are to be facilitated. First, the accreditation cycles vary among the specialized associations from a minimum of one year to a maximum of ten years with the most popular visitation cycle being every five years. Joint agreements must be negotiated for coordinated visitation cycles. The second hurdle relates to the size of the visitation team. For example, several regional accrediting associations now have teams of 20 members or more. The addition of five to ten members for each of the specialized accrediting bodies which cooperate in a joint visitation would be overburdening to the institution and this practice would certainly not reduce cost significantly. This approach may also result in disproportionate representation on the institution team. For example, it was pointed out at the Commission's public meeting that during a recent coordinated visit to a major institution in the Southeast, 11 of the 35 site team members were on campus to review allied health program when less than one percent of the total student body was enrolled in allied health.

Most specialized accrediting bodies have a set of predetermined national standards against which the quality of the program is judged. Although several of these standards focus on the unique characteristics of the program being examined, most accrediting bodies also solicit generic information on the library, facilities, financial resources, admission and retention and several other factors which could be solicited uniformly. Currently, each of the accrediting bodies request similar data but require that they be displayed or secured in a unique manner. The Common Language Handbook for Postsecondary Accreditation provides a guideline for securing common data which can be incorporated into the professional or program self-study. Hence a significant step will be made towards minimizing duplication and the burden of individual self-studies will be reduced if each specialized accrediting body uses this common data base in the self-study process.

The emergence of a coordinated program review process for Florida's postsecondary education programs in the public sector has caused additional concerns over duplication with specialized accreditation. Recent legislation requires review of every public postsecondary educational program by the appropriate coordinating or governing board on a five year cycle. Each board has developed program review standards and each requires the preparation of an institutional document and on-site visitation by a review team. The five year schedule is now being implemented in each sector. The two major purposes for the required program review are to ensure quality and to establish funding needs and priorities for statewide planning. Although, state program review and specialized accreditation are two separate processes, they can and should be complementary as they are both concerned with the assessment of program quality based on a set of standards.

The standards and practices utilized in the two processes are not dissimilar. Both accreditation and program review rely on quantitative standards in such areas as student outcomes, faculty and professional staff quality and productivity, and quality and assessibility of library resources. Both processes rely on an institutional report or self-study, an on-site visit, and a visitation team's report. The accreditation structure focuses on an individual program within one institution and the program review structure is cross-institutional. However, both processes terminate with recommendations about individual programs at individual institutions.

To date, there has been little collaboration or cooperation between the various accrediting agencies operating in Florida's public postsecondary education institutions and the State's governing or coordinating boards which regulate the program review processes. Such collaboration would eliminate the current need for separate self-studies for both processes which are duplicative and costly.

Part of the reason for the separation and isolation of the two processes in that the state's program review is an emerging model and, as such, is experiencing the implementation hurdles of a new process. The Board of Regents is now coordinating the two processes and intends to utilize specialized accreditation reports as base data for BOR program reviews. Also, Board of Regents staff now participate in specialized accreditation visitation team exit meetings at state universities. At present, the State Board of Community Colleges has not attempted to consolidate the results of specialized accreditation with their program review process.

Recommendations:

1. In an effort to avoid duplication and reduce costs, the State governing and coordinating boards should adopt a policy which strongly encourages institutions to seek collaboration among regional and specialized accrediting associations in an effort to implement the COPA guidelines on interagency cooperation and, to the extent possible, coordinate visitations by accrediting agencies to each institution. In a coordinated visit, the number of representatives for each accrediting agency should be reduced.

2. The Board of Regents and State Board of Community Colleges should promote the adoption of a common data base by encouraging use of the Common Language Handbook for Postsecondary Accreditation developed by COPA in the program review, institutional licensure, and accreditation processes.

3. The Board of Regents, the State Board of Community Colleges, and the Division of Vocational, Adult and Community Education should explore the possibility for cooperative visitations with specialized accrediting agencies. A state policy on the linkage between the program review process and specialized accreditation should be developed by each sector. The

institutional self-study and most recent specialized accreditation report should be incorporated as an integral part of the program review process for all programs which are accredited.

E. Coordination Between Institutional Licensure by the State and Accrediting Agencies

The licensure of independent postsecondary institutions in Florida by the State and the accreditation of postsecondary institutions by non-governmental accrediting agencies have separate but complementary functions. Licensure is a state regulatory activity which was enacted in Florida to protect the integrity of the degrees and diplomas conferred by privately supported postsecondary institutions. Minimal quality standards have been prescribed through legislation to protect individuals from deceptive, fraudulent, or substandard education. In comparison, accreditation is a self-regulatory, peer review process through which an association recognizes an institution as having met a set of predetermined minimal standards. An important component of both processes is a set of minimum standards created to promote quality assurance in postsecondary education.

An examination of the scope of the current processes of state licensure and accreditation and the relationship of these processes to each other revealed areas in which improvements could be made. These areas are off-campus programs and telecommunications.

State Regulation and Accreditation of Off-campus Programs

During the 1970's, colleges and universities throughout the United States expanded off-campus programs. Such programs have been generally characterized by their flexibility in adapting to individual student needs. Instruction occurs in a variety of locations at convenient hours and channels of delivery other than the traditional lecture or seminar have emerged. For example, the use of correspondence courses and home study programs have become popular. Frequently, courses are offered on weekends in a location far removed from the home institution as an attempt to accommodate the needs of working students and others who may be pursuing an advanced degree, but who have difficulty enrolling in classes on the traditional campus. Public, private, and proprietary institutions are involved in conducting these off-campus courses. Among the concerns which have been expressed about these non-traditional programs during the last decade by state legislatures, state regulatory boards, regional accrediting agencies and postsecondary institutions, quality assurance is perhaps the most prominent.

Quality assurance for programs offered away from campus or through nontraditional means theoretically has been the responsibility of regional accrediting bodies. Most accrediting associations have adopted the programmatic policy that quality assurance for off-campus programs is the responsibility of the parent institution. Time and geographic distance have frequently prevented careful on-site evaluations of non-traditional, off-campus programs.

Other concerns include program duplication and lack of coordination among institutions and competition between public and independent institutions, often on an interstate level. This latter condition has led established institutions to request support from the state regulatory agency to reduce or eliminate the competition.

Because of the rapid expansion in and unacceptable level of quality of certain off-campus programs, COPA adopted a policy statement in 1976 on off-campus degree programs offered by accredited institutions. The policy statement, updated in 1983, provides a "framework for COPA-recognized accrediting bodies to deal in a consistent and effective manner with their member institutions involved in off-campus educational credit programs and courses" (COPA, 1983).

The following principles are contained in the COPA policy statement:

1. In evaluating off-campus educational activities, the fundamental concern of the accrediting body must be with the unity, continuity and quality of education--institutional and programmatic. Central issues are integrity, administrative and academic control, quality assurance, availability of resources, and supervisory accountability.

2. An institutional accrediting body is responsible for assuring the quality and integrity of all programs of the institution, wherever located.

3. When an educational activity is located outside the region of its home campus and the activity is determined by the regional accrediting body to be separately accreditable, evaluation of the educational activity is the responsibility of the region of location.

Commensurate with these COPA guidelines, SACS has developed standards for the review of off-campus programs. The SACS policy states that off-campus programs must be reported by an accredited institution to the Association; failure to report new programs jeopardizes the accreditation of the institution by the Southern Association. The following programs are required to be reported: off-campus locations, including military bases; correspondence and independent study courses; and external degree programs.

SACS policies and procedures emphasize that the institution is responsible for ensuring the quality and integrity of all programs of institutions, wherever they are located. However, SACS only visits certain off-campus sites. The Commission on Colleges in consultation with the institutional administrator decides which sites to visit to evaluate satisfactorily the overall off-campus program offered by the institution.

An analysis of the current state licensing and accreditation processes in Florida by the Commission has identified a weakness in the area of off-campus regulation. Regional accrediting associations permit accredited institutions to offer off-campus courses and the institution is responsible for the quality of these programs. Although SACS does have a policy on the accreditation of off-campus programs in that the separate operations must be reported, only a selected sample of these off-campus programs are actually visited. Out-of-state degree granting institutions must be licensed by the State Board of Independent Colleges and Universities even if they are accredited; however, in-state public and private institutions which are chartered in Florida and accredited by SACS or another institutional accrediting body do not have to be licensed. The 1983 Legislature required the SBICU to review the branch campuses of private institutions in Florida but this provision was repealed in 1984, prior to implementation, due to institutional concerns about administrative burdens and lack of a similar procedure for public institutions. Quality for these branch or off-campus programs continues to remain the responsibility of the institution and the accrediting agency.

Recommendation:

1. The Southern Association of Colleges and Schools should have the primary responsibility for monitoring the off-campus activities of accredited institutions chartered in Florida to verify that minimal quality standards are being maintained. SACS policy should require that cyclic on-site visitations be conducted by the Southern Association to all off-campus sites of SACS-accredited institutions operating in Florida.
2. When an on-site visitation is conducted to an off-campus site in Florida by a regional accrediting association outside the Southern region, the Southern Association should be invited to participate in a joint visitation.
3. If deficiencies in quality are noted by the state licensing boards, or other state coordinating and governing boards, these deficiencies should be reported to the Florida Commissioners on the SACS Commission on Colleges and on-site visitations to the branch campuses in question should be conducted by the Southern Association of Colleges and Schools.

State Regulation and Accreditation of Distance Learning Through Telecommunications

One of the most complex issues affecting accreditation and state licensure has emerged in the 1980's with the increased use of distance learning through telecommunications. Several national institutions such as the National Technological University and the American Open University have been established. These institutions cross state lines by bringing credit courses into a state through the use of computer, television, video cassette, satellite and other audio-video formats.

A peculiarity of learning through telecommunications is that the state has no authority to regulate the transmission or reception of electronic signals sent from another state. Thus, solely on the basis of the signal, the State of Florida has no basis for regulating a course taken by a student in Florida which originates from an institution in another state.

Florida Statutes do not authorize the state licensing boards to exercise jurisdiction over learning by telecommunications. However, Florida Statute 240.081(d) states that "no non-public college which is required to have a license and no person acting on behalf of such college shall cause to be published in any publication any advertisement soliciting students or offering a diploma or degree, unless such college has a valid license." In addition, support services in Florida, such as institutional representatives who act as counselors, monitors or instructors, provide physical presence so that the State could exercise jurisdiction under existing licensing statutes if physical presence was evident.

A recent study sponsored by COPA and SHEEO addresses the issue of accreditation and authorization of distance learning through telecommunications. A copy of the principles and procedures contained in the study report appear in

Appendix E. This study calls for greater collaboration among state authorizing agencies, accrediting associations and postsecondary institutions in developing standards for the evaluation of postsecondary education offered through telecommunications. The statement highlights the state's responsibility for educational activities and consumer protection. It also sets forth the desirability of state authorization as an initial and necessary prerequisite of accreditation of distance learning through telecommunications. The following is a specific procedure which was suggested in this study for an institution that intends to initiate programs using telecommunication:

1. An institution would provide documentation on the objectives and scope of its programs using telecommunications, including provision for instruction and instructional support.

2. State agencies and accrediting bodies would review the documentation to determine whether the instruction and instructional support meet the established requirements and standards.

3. The documentation would be audited, as appropriate, by state agencies and accrediting bodies and certified as being complete, accurate, and representative of the institution's telecommunications activities. The certified documentation could then be made available to any state agency or accrediting body needing such information.

4. If proper quality and quality controls are evident, approval would be granted by state agencies and accrediting bodies to include the activity within the institution's recognized status.

5. If necessary to reach a sound decision, a state agency or accrediting body may request additional documentation or schedule an on-site visit. The institution, for its part, may withdraw its request without prejudice or appeal any adverse decision to the appropriate body or bodies consistent with due process procedures.

Recommendation:

In accordance with the principles and procedures recommended in the COPA/SHEEO telecommunications project, Florida's licensing boards and the Southern Association of Colleges and Schools should negotiate a joint agreement which will ensure proper control of interstate distance learning through telecommunications. While the intrastate distance learning activities of Florida public institutional programs should be monitored through the program review process, intrastate distance learning through telecommunications of independent institutions should be included in the joint agreement between SACS and the licensing boards.

F. Other Accreditation Issues

Among the various functions which accreditation serves, two are of particular interest to students enrolled in postsecondary institutions which are accredited by a COPA-recognized national rather than regional agency. These are determination of eligibility for transfer of credit to public institutions, and participation in state financial aid programs. As indicated previously in this report, there are a number of institutions in Florida which are accredited by COPA-recognized, national accrediting agencies rather than by SACS - the Association of Independent Colleges and Schools (AICS) accredits 16 Florida institutions; the National Association of Trade and Technical Schools (NATTS) accredits approximately 45; and the American Association of Bible Colleges (AABC) and the National Home Study Council (NHSC) each accredit seven. Public testimony received by the Committee during the study specifically related to the concerns of AICS institutions; however, the following discussion and recommendations address all nationally accredited postsecondary institutions which are authorized to operate in Florida.

Credit Transfer

The issue of credit transfer was addressed at length in the Commission's report on Proprietary Education which was released in March, 1984. The findings of that study are relevant for other nationally accredited institutions and are restated here.

In this discussion of the issue of credit transfer, the Commission acknowledges that accreditation does not guarantee acceptance of credit from one school to another even though both institutions are accredited. Credits whether recognized for transfer or not, can be accepted for one purpose but rejected for another. The ability to accept or reject credits is uniquely within the control of the institution to which the credits seek to be transferred because the accepting institution controls the conditions under which it awards its degree.

The individual policies of Florida's public postsecondary institution generally recognize the transferability of credit from institutions accredited by SACS and other regional associations. In fact, the Board of Regents is considering a rule change which would restrict the transfer of credit to that obtained at a regionally accredited institution. The treatment of students from nationally accredited institutions who attempt to transfer credit to public or independent colleges and universities, or to public vocational technical centers, is less uniform. Even though institutional policy usually provides for course by course evaluation, credit may infrequently be awarded to transfer from non-regionally accredited institutions. If awarded, it may not be counted toward a degree, and credit is rarely awarded on the basis of competency examinations.

The American Association of Collegiate Registrars and Admissions Officers (AACRAO) lists ten variables to be considered in determining the acceptance of transfer credit:

1. Students educational/occupational objectives-past and present.
2. The characteristics of the institution awarding the credit.
3. The characteristics of credit reported on the transcript.
4. The characteristics of the receiving institution, its programs and degree requirements.

5. The diversity/mission of the postsecondary institutions.
6. Institutional autonomy.
7. Inconsistency among institutions in the method of reporting credit on transcripts.
8. The misunderstanding associated with credit for admission and credit for degree. An institution may accept credits but not necessarily apply those credits toward a major field of study.
9. The fairness to the freshman student who was there at beginning and the transfer applicant.
10. Volume of students from all types of postsecondary institutions.

According to a Joint Statement on Transfer and Award of Academic Credit approved by COPA, the American Council on Education and AACRAO in 1978, transfer of credit from one institution to another whether accredited or not involves at least the following three considerations:

1. The educational quality of the institution from which the student transfers;
2. The comparability of the nature, content and level of credit earned to that offered by the receiving institution; and
3. The appropriateness and applicability of the credit earned to the programs offered by the receiving institution, in light of the student's educational goals.

Board of Regents Rule 6C-6.04, FAC, limits the transfer of external degree credits to the State University System only if the credits were granted by a regionally accredited institution. With the exception of this rule, existing State policy on the transfer of student credit to public postsecondary education institutions is silent on the issue of students transferring from institutions other than community colleges. On the subject of public vocational students, State Board of Education Rule 6A-10.24(16), FAC, states:

> When a student transfers among postsecondary area vocational-technical centers, community colleges, and universities, the receiving institution shall award credit for courses satisfactorily completed at the previous institutions when the courses are judged by the appropriate common course designation and number system faculty task forces to be equivalent to courses offered at the receiving institutions and are entered in the course numbering system. Credit so awarded can be used by transfer students to satisfy certificate and degree requirements in these institutions on the same basis as native students.

The State's interest in the acceptance of credit for students who transfer from independent institutions is grounded in concern that Florida citizens not be required unnecessarily to repeat courses or programs for which competencies have been adequately achieved. If these duplicative courses or programs are required by public institutions, the taxpayers of Florida are unnecessarily burdened with the majority of the costs associated with such instruction.

Unwarranted program duplication also may result from refusal to grant credit transfer. Graduates of a one-year health technician program at a reputable proprietary institution in Florida, for example, were repeatedly denied credit for entry to the neighboring public community college's related Associate of Science program. Credit was denied, except through credit-by-examination, even though the proprietary program is accredited by a committee of the American Medical Association. Since the second year of instruction is necessary for national registration in this allied health field, the proprietary institution developed its own two-year therapist program to serve those of its graduates who wished to study further and who had been unable to receive credit for prior study from the community college.

The importance of resolving questions of credit transfer is increased in light of imminent advances in learning through technological means. Private companies are offering courses now by computer, and are negotiating with educational institutions to provide credit for these courses. In addition, the American Council on Education provides in Florida a program to evaluate educational programs offered by organizations whose primary purpose is not education. The Program on Non-Collegiate Sponsored Instruction assists individuals in their attempts to receive academic credit for coursework taken outside colleges and universities.

Many independent institutions in Florida and nationally have developed articulation agreements with other postsecondary education institutions for the transfer of their students' credit. An example of the kind of agreement that provides for a wide acceptance of transfer credit is illustrated by the arrangement between the Department of Engineering Technology at Murray State University (Kentucky) and the Specialized Associate Degree program in electronics at the Institute of Electronic Technology. This agreement provides full credit for several courses, full credit with minor stipulations for other courses, and full credit following a demonstration of proficiency in another course.

Tampa Technical Institute has articulation agreements with numerous public and independent postsecondary education institutions nationwide, but only one agreement with a public college or university in Florida. Since 1975, Bauder College in Fort Lauderdale has had an agreement with Florida International University for the transfer of student credits into a Bachelor of Science program. Additional agreements are being negotiated with several independent universities in the area.

Recommendations:

1. Local articulation agreements between postsecondary institutions which are accredited by a national accrediting association and other postsecondary education institutions in Florida should be encouraged and facilitated. The Statewide Course Numbering System should be expanded at the option of the institution to include courses offered by licensed, independent postsecondary education institutions which are accredited by a national accrediting body. Course equivalencies as determined by the Statewide Course Numbering System should assist in the creation of agreements between institutions whenever a nationally-accredited institution is a participant in the system. The agreements should take into account the three considerations identified in the joint statement on Transfer and Award of Academic Credit.

2. State universities, public community colleges, and area vocational-technical centers should adopt competency-based procedures to evaluate and award transfer credit to students from institutions whenever possible and appropriate to supplement local articulation agreements.

State Financial Aid Eligibility

Accreditation plays an integral role in the determination of institutional eligibility for participation in state student financial aid programs. In addition to public colleges and universities and approved nursing diploma schools, participation in the Florida Student Assistance Grant (FSAG) Program (S.240.409,F.S.) and the Florida Academic Scholars (FAS) Program (S.240.402,F.S.) is allowed for "any Florida college, university or community college which is accredited by a member of the Council on Postsecondary Accreditation, or any Florida institution the credits of which are acceptable for transfer to state universities."

The College Career Work Experience Program (CCWEP - SS.240.60-603,F.S.) requires institutional accreditation by a member of COPA but is further limited to "non-profit", state chartered, non-sectarian institutions which grant baccalaureate and associate degrees, and whose credits are acceptable without qualification for transfer to state universities.

As discussed earlier in this report, the membership of COPA includes associations which accredit a wide variety of institutions ranging from comprehensive universities to single purpose trade schools and home study courses. Consequently, the level of studies pursued by students enrolled in these institutions may range from courses taken to obtain a certificate to postgraduate education towards an advanced degree. Although state financial assistance programs are limited to the undergraduate level, the eligibility of certificate programs is not specifically addressed. While school district operated vocational technical centers are excluded from participation since they are not by definition a college or university, students enrolled in similar programs offered by public community colleges, accredited proprietary schools and other eligible independent institutions may receive FSAG and FAS awards.

State policy properly has been not to intervene in transfer problems. Only Board of Regents Rule 6C-6.04(2)(c) and (d), FAC, relating to college level courses taken in high school and external degree programs, deals with the transfer of credit from accredited independent collegiate institutions to public institutions. In situations not covered by the Board of Regents rule, the considerations outlined by AACRAO and COPA which were set forth in the preceding section, should continue to be used by individual institutions to make determinations on a case by case basis. Most public institutions accept, as a rule, credit from a regionally accredited institution. However, the present system for determining eligibility for major state assistance programs has caused some concerns. To take an extreme example, if one student from an independent institution transfers one credit to a public university does that entitle that institution's students to participate fully in the FSAG program? Conversely, if all but a few credits of a particular institution are acceptable at a state university should students at that institution be excluded from the College Career Work Experience Program? It should be stressed that the Commission does not advocate credit transfer decisions being made at the state level and is not taking a position regarding which students and institutions should be eligible for participation in the State financial aid programs.

Resolution of these issues goes beyond the scope of the present study; however, these questions are raised to point out that accreditation is being used as a screening mechanism in an area in which alternative or supplementary standards may be desirable to assure consistent policy for the achievement of the State's goal of access to postsecondary education.

Recommendation:

The criteria used to determine institutional eligibility for participation in state financial aid programs should be examined by the Office of Student Financial Assistance in the Department of Education to determine whether alternative or supplementary standards may be required in addition to accreditation criteria. This review should include an analysis of additional funds required as a result of any changes in the standards for institutional eligibility for participation in each of the State's financial aid programs.

G. Planning for Collaboration Among the Southern States

Throughout the pages of this report, the need for collaboration among the accrediting associations as well as between accrediting associations and the State was recognized. In addition, several recommendations focused on the need for change in the accreditation process and procedures.

Regional accreditation in Florida and 10 other Southern states is under the control of the Southern Association of Colleges and Schools (SACS). SACS is an independent, voluntary, self-governing organization. Because SACS is a regional democratically-governed association, it is difficult for a single state to have a major impact on its procedures and standards. The range in SACS member institutions within the Commission on Colleges is enormous--from very small schools of less than 100 students to large universities such as the Universities of Florida, Georgia and Texas. The needs and demands of all member colleges and universities, whether private or public, are not the same.

The large governance structure of the Commission on Colleges compounds resistance to change. This resistance is exemplified by the proposed addition of a vaguely worded product-oriented standard on institutional effectiveness. The Commission on Colleges first considered this modification in 1980. Approval of the revised set of standards by the 66 members of the College Delegate Assembly occurred in December 1984.

Because of the structure within the Southern Association which must approve any modifications in procedures or policy, a single state may not and should not be able to bring sufficient pressure to bear for changes without regional consensus. During the course of the study, the Committee Chairman was in contact with state officials in Virginia, Texas, Kentucky, and Tennessee. Officials in these states indicated that changes in regional accreditation were warranted and believe collaboration in promoting change is worth exploring.

At the November 15, 1984 Postsecondary Education Planning Commission meeting, a formal approach for securing the input and perhaps the co-sponsorship of other states was endorsed; it was recommended that a meeting of postsecondary education officials in the Southern states be convened in the Spring to discuss the Commission's report and issues involved. One purpose of the meeting would be to determine whether a group with interstate concerns should be designated to facilitate and monitor changes in accreditation.

Recommendation:

In Spring 1985, following transmittal of the Commission report to the Legislature and State Board of Education, the Postsecondary Education Planning Commission should host a meeting for representatives of the 11 Southern states which are under the jurisdiction of the Southern Association of Colleges and Schools. The purpose of this meeting would be to address the findings and recommendations contained in the Commission's study, to secure regionwide consensus on needed changes in regional and specialized accreditation, and to seek an interstate mechanism for promoting and monitoring change.

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APPENDIX A

Accrediting Associations

Accreditation of Specialized Programs and Professional Schools in the State University System

ACCREDITING AGENCIES AND ASSOCIATIONS

Approved by the United States Department of Education

Regional Institutional Accrediting Associations

1. Middle States Association of Colleges and Schools
2. New England Association of Schools and Colleges [1]
3. North Central Association of Colleges and Schools [1]
4. Northwest Association of Schools and Colleges
5. Western Association of Schools and Colleges [2]
6. Southern Association of Colleges and Schools [1]

National Institutions and Specialized Accrediting Bodies

1. Committee on Allied Health Education and Accreditation
2. National Architectural Accrediting Board, Inc.
3. National Association of Schools of Art and Design
4. American Association of Bible Colleges
5. National Accreditation Council for Agencies Serving the Blind and Visually Handicapped
6. American Association of Blood Banks [3]

[1] The association has separate commissions for colleges and universities and for vocational institutions.

[2] Separate commissions operate for four-year institutions, junior and community colleges, and vocational institutions.

[3] Accreditation is done in cooperation with the Committee on Allied Health Education and Accreditation.

Source: The Control of the Campus, 1982

7. American Assembly of Collegiate Schools of Business
8. Association of Independent Colleges and Schools
9. The Council on Chiropractic Education
10. Association for Clinical Pastoral Education, Inc.
11. Council for Non-Collegiate Continuing Education
12. National Accrediting Commission of Cosmetology Arts and Sciences
13. American Society of Cytology[3]
14. Joint Commission on Dance and Theater Accreditation
15. American Dental Association
16. The American Dietetic Association
17. Accreditation Board for Engineering and Technology, Inc.
18. Society of American Foresters
19. American Board of Funeral Service Education
20. Accrediting Commission on Education for Health Services Administration
21. National Accrediting Agency for Clinical Laboratory Sciences[3]
22. National Home Study Council
23. Foundation for Interior Design Education Research
24. Accrediting Council on Education in Journalism and Mass Communications
25. American Society of Landscape Architects
26. American Bar Association
27. American Library Association
28. American Association for Marriage and Family Therapy
29. Accrediting Bureau of Health Education Schools
30. American Association of Medical Assistants[3]
31. American Medical Record Association[3]
32. Liaison Committee on Medical Education of the Council on Medical Education of the American Medical Association and the Executive Council of the Association of American Medical Colleges
33. American Academy of Microbiology
34. National Association of Schools of Music
35. Joint Review Committee on Educational Programs in Nuclear Medicine Technology[3]
36. American Association of Nurse Anesthetists
37. National Association for Practical Nurse Education and Service, Inc.
38. National League for Nursing, Inc.
39. American Occupational Therapy Association[3]
40. National Association of Trade and Technical Schools
41. American Optometric Association
42. American Osteopathic Association
43. American Council on Pharmaceutical Education
44. American Physical Therapy Association
45. Joint Review Committee on Education Programs for Physician's Assistants
46. American Podiatry Association
47. American Psychological Association
48. Council on Education for Public Health
49. Association of Advanced Rabbinical and Talmudic Schools
50. Joint Review Committee on Education in Radiologic Technology[3]
51. Joint Review Committee for Respiratory Therapy Education[3]
52. Council on Social Work Education
53. American Speech-Language-Hearing Association
54. Joint Review Committee on Education for the Surgical Technologist
55. National Council for Accreditation of Teacher Education
56. Association of Theological Schools in the United States and Canada
57. American Veterinary Medical Association
58. New York State Board of Regents

State University System of Florida
Accreditation Status of Professional Schools/Specialized Programs
By Institution

NAME OF PROGRAM	UF	FSU	FAMU	USF	FAU	UWF	UCF	FIU	UNF
Forestry	A	-	-	-	-	-	-	-	-
Architecture	A	-	A	-	-	-	-	-	-
Urban Planning	A	A	-	-	-	-	-	-	-
Interior Design	A	A	-	-	-	-	-	N	-
Landscape Arch.	A	-	-	-	-	-	-	-	-
Business Admin.	A(B&M)	A(B&M)	N	A(B&M)	A(B&M)	N	A(B&M)	A(B)	A(B&M)
Journalism	A	-	A	A	-	-	N	-	-
Education	A	A	A	N	A	N	N	N	N
Engineering	A	N	N	A	A	-	A	N	-
Engineer. Tech.	-	-	A	N	-	-	A	A	-
Building Const.	A	-	N	-	-	-	-	A	-
Indust. Technol.	-	-	-	-	-	-	-	-	N
Radiolog. Tech	-	-	-	-	-	-	A	-	-
Med. Technol	A	N	-	A	A	N	A	A	-
Voc. Rehab.	A	A	-	A	-	-	-	-	-
Physician Asst.	A	-	-	-	-	-	-	-	-
Occu. Therapy	A	-	-	-	-	-	-	A	-
Physical Ther.	A	-	N	-	-	-	-	A	-
Respir. Ther.	-	-	N	-	-	-	A	-	-
Speech & Hearing	A	A	-	A	-	-	N	-	-
Dentistry	A	-	-	-	-	-	-	-	-
Health Care Adm.	A	-	N	-	N	-	-	N	-
Med. Rec. Adm.	-	-	N	-	-	-	A	A	-
Medicine	A	-	-	A	-	-	-	-	-
Nursing	A(B&M)	A	A	A(B&M)	N	A	A	N	N
Pharmacy	A	-	A	-	-	-	-	-	-
Public Health	-	-	-	N	-	-	-	-	-
Vet. Med.	A	-	-	-	-	-	-	-	-
Home Econ.	-	A	-	-	-	-	-	N	-
Dietetics & Nut.	A	A	-	-	-	-	-	A	-
Law	A	A	-	-	-	-	-	-	-
Library Sci.	-	A(M)	-	A(M)	-	-	-	-	-
Recreation	A	A	-	-	-	-	-	N	-
Chemistry	A	A	N	A	A	A	A	A	N
Psychology	A	A	-	A	-	-	-	-	-
Social Work	-	A(B&M)	A(B)	A(B)	A(B)	A(B)	A(B)	A(B&M)	-
Dance	-	N	-	N	-	-	-	-	-
Theatre	N	A	N	N	N	N	N	N	-
Art Schools	N	N	-	N	N	N	N	N	N
Music Schools	A	A	N	N	A	A	A	N	N

A=Accredited
B=Baccalaureate
N=Not Accredited
-=No such program/school at institution
M=Masters

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APPENDIX B

Costs for Regional and Specialized Accreditation as Reported by Selected Florida Institutions

Institutional Costs for Accreditation

Eight postsecondary institutions in Florida were asked to supply data on costs for both institutional accreditation and each of the specialized accrediting associations which accredit professional programs at these individual institutions. Seven institutions responded to this request including Florida State University, University of Florida, University of Central Florida, Brevard Community College, Rollins College, Lively Area Vocational Technical Center, and Tampa College.

The first five of these institutions are accredited by SACS Commission on Colleges and the cost data is contained in Table A. Lively Area Vocational Technical Center is accredited by the SACS Commission on Occupational Educational Institutions (COEI) and Tampa College is accredited by the Association of Independent Colleges and Schools (AICS). The costs for institutional accreditation for these two schools is in Table B. Finally, a sample of the costs for specialized accreditation at these institutions is in Tables C1 and C2.

TABLE 3

INSTITUTIONAL ACCREDITATION COSTS FOR SACS COMMISSION ON COLLEGES

COSTS	INSTITUTIONS				
	University of Florida	Florida State University	University of Central Florida	Brevard Community College	Rollins College
I. Direct Costs					
a. Annual Membership Fee	$ 2,610	$ 2,600 (approx.)	$ 2,320	$ 2,320	
b. Travel Paid by Institution					
1. Total cost for visitation team (Travel, meals, lodging, honorarium)	$10,382	$12,646	$14,300	$ 7,931	$ 9,238
No. persons on visitation team	18	17	16	12	
2. Other trips by team chairman or members	---	---	$ 300	---	
3. Travel by institutional staff	$ 800	$ 493	$ 300	$ 80	$ 600
4. Travel of accrediting association staff paid by instiution	---	$ 150	$ 300	---	
c. Cost for full/part-time coordinator or other professional staff to prepare self-study and coordinate visit (include only if person was hired for this purpose or relieved of other duties)	$50,560	$57,578	$67,275	---	$ 7,426
d. Cost for support staff to type self-study and other reports (if hired for this purpose)	$17,728	$ 1,165	$11.665	---	$ 1,461
e. Estimated costs for materials, printing, distribution and postage, telephone	$ 1,100	$ 4,938	$ 6,400	$ 741	$ 3,419
f. Other Costs (e.g. entertainment)	$ 50	$ 1,123	$ 2.600	---	
TOTAL	$83,231	$80,693	$105,460	$10,330	$22,144
II. Indirect Costs**					
a. Estimated number of hours of professional staff time (include all committees to prepare self-study, meetings in conjunction with visit, etc.) Do not include hours spent by person identified in I c.	5,700	3,462	5,040	2,144	$ 350
b. Estimated number of hours of support staff time excluding person(s) identified in I d.	495	---	---	160	$ 100
c. Other indirect costs	---	---		---	

**NOTE: Your response to II a and II b should not duplicate costs identified in I c and I d. For example, if no coordinator or staff were hired or relieved of other duties for accreditation, then only II a and II b should be completed. If a coordinator and/or staff were hired for the self-study, etc., then II a and II b should only reflect hours of regular staff not included in Item I.

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TABLE B

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INSTITUTIONAL ACCREDITATION COSTS

COSTS	INSTITUTION	Lively Vocational Technical Center	Tampa College
	ACCREDITED BY	SACS- Commission of Occupational Educational Institutions (COEI)	Association of Independent Colleges and Schools
I. Direct Costs			
a. Annual Membership Fee		$ 1,500	$ 7,000
b. Travel Paid by Institution			
1. Total cost for visitation team (Travel, meals, lodging, honorarium)		$ 6,000	$ 6,116
No. persons on visitation team		15	7
2. Other trips by team chairman or members		---	---
3. Travel by institutional staff		---	---
4. Travel of accrediting association staff paid by instiution		---	---
c. Cost for full/part-time coordinator or other professional staff to prepare self-study and coordinate visit (include only if person was haired for this purpose or relieved of other duties)		---	---
d. Cost for support staff to type self-study and other reports (if hired for this purpose)		---	---
e. Estimated costs for materials, printing, distribution and postage, telephone		$ 500	$ 400
f. Other Costs (e.g. entertainment)		$ 475	---
TOTAL		$ 8,475	$13,516
II. Indirect Costs**			
a. Estimated number of hours of professional staff time (include all committees to prepare self-study, meetings in conjunction with visit, etc.) Do not include hours spent by person identified in I c.		4,500	150
b. Estimated number of hours of support staff time excluding person(s) identified in I d.		1,000	30
c. Other indirect costs		---	---

**NOTE: Your response to II a and II b should not duplicate costs identified in I c and I d. For example, if no coordinator or staff were hired or relieved of other duties for accreditation, then only II a and II b should be completed. If a coordinator and/or staff were hired for the self-study, etc., then II a and II b should only reflect hours of regular staff not included in Item I.

TABLE C1

COSTS FOR SPECIALIZED ACCREDITATION IN SELECTED PROGRAMS

	Specialized Accreditating Agency	Accreditation Board for Engineering Technology	National Council for the Accreditation of Teacher Education	American Assembly of Collegiate Schools of Business
	Institution	University of Florida	Florida State University	Florida State University
	Accreditation Cycle	6 years	10 years	10 years
COSTS	Reporting Period	1983-84	1981-82	1984-85
I. DIRECT COSTS				
a. Annual membership fee		$ 375	$ 582	$ 7,100
b. Travel paid by institution		$15,725	$10,843	$ 3,292
c. No. persons on visitation team		19	15	6
d. Cost for full/part-time coordinator or other professional staff to prepare self-study and coordinate visit (include only if person was hired for this purpose or relieved of other duties)		---	$30,000	---
e. Cost for support staff to type self-study and other reports (if hired for this purpose)		---	$ 3,000	---
f. Estimated costs for materials, printing, distribution and postage, telephone		$ 3,000	$ 3,200	$11,616
g. Other costs (e.g. entertainment)		$ 465	$ 250	$ 1,000
TOTAL		$19,565	$47,875	$23,008
II. INDIRECT COSTS				
a. Estimated number of hours of professional staff time (include all committees to prepare self-study, meetings in conjunction with visit, etc.) Do not include hours spent by person identified in I d.		4,500	10,800	56,614
b. Estimated number of hours of support staff time excluding person(s) identified in I e.		1,120	5,400	10,808
c. Other indirect costs		500	---	1,000

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TABLE C2

COSTS FOR SPECIALIZED ACCREDITATION IN SELECTED PROGRAMS

COSTS	Specialized Accreditating Agency	CAHEA Committee for Respiratory Therapy Education	CAHEA Committee Radiologic Technology	CAHEA Committee on Respiratory Therapy Education	CAHEA Medical Record Administration
	Institution	Brevard Community College	Brevard Community College	University of Central Florida	University of Central Florida
	Accreditation Cycle	5 years	5 years	5 years	3 years
	Reporting Period	1983-84	1983-84	1981-82	1982-83
I. DIRECT COSTS					
a. Annual membership fee		$ 300	$ 500	$ 325	$ 300
b. Travel paid by institution		$ 500	---	$ 1,050	$ 520
c. No. persons on visitation team		3	3	2	3
d. Cost for full/part-time coordinator or other professional staff to prepare self-study and coordinate visit (include only if person was hired for this purpose or relieved of other duties)		---	---	$ 5,800	$ 2,500
e. Cost for support staff to type self-study and other reports (if hired for this purpose)		---	---	$ 750	---
f. Estimated costs for materials, printing, distribution and postage, telephone		$ 250	$ 250	$ 1,400	$ 300
g. Other costs (e.g. entertainment)		$ 75	$ 75	$ 25	---
TOTAL		$ 1,125	$ 825	$ 9,350	$ 3,619
II. INDIRECT COSTS					
a. Estimated number of hours of professional staff time (include all committees to prepare self-study, meetings in conjunction with visit, etc.) Do not include hours spent by person identified in I d.		400	400	100	500
b. Estimated number of hours of support staff time excluding person(s) identified in I e.		50	50	45	220
c. Other indirect costs		---	---	---	---

APPENDIX C

A Comparison of the State Board of Independent Postsecondary Vocational, Technical, Trade and Business Schools and the State Board of Independent Colleges and Universities

COMPARISON OF STATE BOARD OF INDEPENDENT POSTSECONDARY VOCATIONAL, TECHNICAL, TRADE AND BUSINESS SCHOOLS AND THE STATE BOARD OF INDEPENDENT COLLEGES & UNIVERSITIES

	STATE BOARD OF INDEPENDENT POSTSECONDARY, VOCATIONAL, TECHNICAL, TRADE AND BUSINESS SCHOOLS	STATE BOARD OF INDEPENDENT COLLEGES AND UNIVERSITIES
	PURPOSE	
PURPOSE	Protection from deceptive, fraudulent or substandard education Protect the citizens of Florida holding diplomas or degrees	Encourage privately-supported higher education Protect the integrity of degrees and diplomas conferred by privately supported colleges Protect the individual student from deceptive, fraudulent or substandard education
COMPOSITION OF BOARD	The State Board of Independent Postsecondary Vocational, Technical, Trade and Business Schools consists of nine members appointed by the governor: one from a business school, one from a technical school, one from a home study school, two from non-public vocational and business schools, three from business and industry and one from public schools.	The State Board of Independent Colleges and Universities consists of nine members appointed by the Governor: Five educators are selected from private colleges or universities in Florida, two educators are selected from publicly supported community colleges or the state university system, and two citizens who do not derive a majority of their income from educational or education-related fields are selected.

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LICENSING OF INSTITUTIONS

	STATE BOARD OF INDEPENDENT POSTSECONDARY VOCATIONAL, TECHNICAL, TRADE AND BUSINESS SCHOOLS	STATE BOARD OF INDEPENDENT COLLEGES AND UNIVERSITIES
MINIMUM STANDARDS	Listed in F.S. 246.213	SBICU recommended to State Board of Education Minimum Standard FS 246.051 Minimum Standards listed in SBRGE-2.03
	Application	Name
	Statement of Purpose	Statement of Purpose
	Administrative Organization	Administrative Organization
	Educational Program	Educational Program
	Curricula	Curricula
	Finances	Finances
	Faculty	Faculty
	Student Personnel Services	Student Personnel Services
	Physical Plant & Facilities	Physical Facilities
	Library	Library
	Publications	Publications
	Financial Stability	Admissions

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	STATE BOARD OF INDEPENDENT POSTSECONDARY, VOCATIONAL, TECHNICAL, TRADE AND BUSINESS SCHOOLS	STATE BOARD OF INDEPENDENT COLLEGES AND UNIVERSITIES
MINIMUM STANDARDS (cont)	Disclosure statements about the status of the institution in relation to professional certification and licensure	Disclosure statements about the status of college in relation to professional certification and licensure
DEGREE GRANTING	10 degree granting institutions as well as those which offer certificate and diploma programs	Degree granting institutions which may also offer certificate and diploma programs
LICENSED INSTITUTIONS	247 institutions; all follow licensing procedure	126 independent institutions within jurisdiction - majority are exempted from licensing requirements
LICENSE PERIOD AND RENEWAL	License effective one year from date of issuance and subject to annual renewal	License subject to annual review and renewal
CONSUMER PROTECTION	Surety bond or insurance may be required to ensure the completion of training of currently enrolled students or issuance of refunds	246.095 Disclosure to prospective students; condition of licensing-Every college which is required to be licensed under the provisions of s. 246.081 and which either directly or indirectly solicits for enrollment any student shall disclose to each prospective student a statement of the purpose of such college, its educational programs

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	STATE BOARD OF INDEPENDENT POSTSECONDARY, VOCATIONAL, TECHNICAL, TRADE AND BUSINESS SCHOOLS	STATE BOARD OF INDEPENDENT COLLEGES AND UNIVERSITIES
CONSUMER PROTECTION (cont)		and curricula, a description of its physical facilities, its status regarding licensure, and the fact that additional information regarding the college may be obtained by contacting the State Board of Independent Colleges and Universities, Department of Education, Tallahassee
LICENSE REQUIRED	Independent institution shall submit a notarized application to and obtain from the board a license in the manner and form prescribed by the board	Non-public colleges shall apply for and obtain from the board a license in the manner and form prescribed by board
	EXEMPTION FROM INSTITUTIONAL LICENSURE	
EXEMPTIONS FROM LICENSING REQUIREMENT	Exemptions: FS 246.201(4) Any school or business regulated by the state or approved, certified or regulated by the Federal Aviation Administration. Non-profit schools, owned, controlled, operated and conducted religions, denominational, eleemosynary or similar public institutions exempt from property taxation	Exemptions: FS 246.085 Any college provided, operated and supported by the state or any political subdivision or by the Federal Government. Any college or course licensed or approved for establishment and operation under Chapter 461, 466, 475, 476, 477 or any other chapter of the Florida Statutes requiring licensing or approval as defined in ss 246.011-246.151.

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	STATE BOARD OF INDEPENDENT POSTSECONDARY, VOCATIONAL, TECHNICAL, TRADE AND BUSINESS SCHOOLS	STATE BOARD OF INDEPENDENT COLLEGES AND UNIVERSITIES
EXEMPTIONS FROM LICENSING REQUIREMENTS (cont)		Accredited Florida colleges shall submit a copy of their current Florida charter as approved by the Florida Secretary of State, and a letter from the recognized accrediting agency by whom the college is accredited, confirming the current accredited status of the college. The board may require further evidence and make such further investigation as in its judgement may be necessary.
	LICENSING OF AGENTS	
	Agents shall submit a notarized application to and obtain from the board an agent's license	Agents shall obtain a license in the manner prescribed by board
INFORMATION REQUIRED FOR LICENSING OF AGENTS	Name Residential & Business Address Background training Institution or institutions to be represented	Name Residential & Business Address Background training College to be represented
	LICENSING FEE	
LICENSE FEE	Five licensing fees 1. Original license application fee for each free-standing institution (branch campus or extension location) - $250.00 2. Annual renewal fee - $100.00 3. Agent's license fee - $50.00	Four licensing fees 1. Initial application fee - $500.00 2. Annual review or other renewal fee - $150.00 3. Supplemental application fee for additional fees or courses of instruction $100.00

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	STATE BOARD OF INDEPENDENT POSTSECONDARY, VOCATIONAL, TECHNICAL, TRADE AND BUSINESS SCHOOLS	STATE BOARD OF INDEPENDENT COLLEGES AND UNIVERSITIES
LICENSE FEE (cont)	4. Agent's license fee - $25.00 5. Delinquent applicant fee for license renewal - $50.00	4. Annual fee for agents representing colleges - $25.00
REFUSAL, SUSPENSION OR REVOCATION OF LICENSE	REVOCATION OF LICENSE Any license under ss. 246.201-246.231 may be refused, suspended or revoked by the board for cause. Under ss.246.201-246.231, the board shall have the power to refuse to issue a license and to suspend or revoke a license in any case in which the board finds that the licensee has violated any of the rules and regulations of the State Board of Education pertaining to ss.246.201-246.231.	Any license required under the provisions of ss.246.011-246.151 may be refused, revoked, or suspended by the board for cause. The board shall have the power to suspend or revoke a license in any case in which the board finds that the licensee has violated any of the provisions of ss.246.011-246.151 or the rules of the State Board of Education pertaining to ss.246.011-246.151.
PENALTIES	1. First conviction is guilty of a misdemeanor of the second degree. 2. Second conviction guilty of a misdemeanor of the first degree. 3. May have license revoked.	1. First conviction is guilty of a misdemeanor of the second degree. 2. Second conviction guilty of a misdemeanor of the first degree.
BRANCH, CENTER OR OFF-CAMPUS OPERATION	BRANCHES Not statutorily defined	A branch educational operation of an accredited non-public college located 50 miles beyond the main campus shall be subject to review and authorization by the board, unless the branch operation is separately approved by an accrediting agency recognized by the U.S. Department of Education. The board shall adopt rules for review of branch educational operations.

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DATA COLLECTION

STATE BOARD OF INDEPENDENT POSTSECONDARY, VOCATIONAL, TECHNICAL, TRADE AND BUSINESS SCHOOLS

Not statutorily designated

DATA COLLECTION

STATE BOARD OF INDEPENDENT COLLEGES AND UNIVERSITIES

(1) The board shall serve as a central agency for collection and distribution of current information regarding the following institutions:

- (a) Colleges licensed by the board;
- (b) Nonpublic colleges and universities eligible to participate in state student financial aid programs;
- (c) Colleges applying for licensure to the board and
- (d) Other nonpublic colleges that wish to submit the requested data in order to participate in the information dissemination.

The information collected by the board shall be compatible with the total management information system developed by the Department of Education.

(2) The data collected by the board shall include information relating to the college or university administration, calendar system, admissions requirements, student costs and financial obligations, financial aid information, refund policy, placement services, number of full-time and part-time faculty, student enrollment and demographic figures, degree programs, and off-campus academic programs. Other information shall be collected in response to specific needs or inquiries.

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	STATE BOARD OF INDEPENDENT POSTSECONDARY, VOCATIONAL, TECHNICAL, TRADE AND BUSINESS SCHOOLS	STATE BOARD OF INDEPENDENT COLLEGES AND UNIVERSITIES
DATA COLLECTION (cont)		(3) The board shall provide to each participating college and university, in the fall of each year, the format, definitions, and instructions for submitting the required information. (4) The data submitted by each college shall be accompanied by a letter of certification, signed by the chief administrative officer of the college, affirming that the information submitted is accurate. (5) A summary of the data collected by the board shall be included in the annual report to the Governor. The information collected by the board may also be used by the Department of Education for such purposes as statewide master planning, state financial aid programs, and publishing directories; by the legislature; and to respond to consumer inquiries received by the board.

ADMINISTRATION OF AGENCY

RELATIONSHIP TO DOE	Budgetary, personnel and related administrative function	Budgetary, personnel and related administrative function
EXPENDITURE	General Revenue Fund	General Revenue Fund
ACCOUNTABILITY	Annual Report to Governor	Annual Report to Governor

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JURISDICTION OF AGENCY

DEFINITION

STATE BOARD OF INDEPENDENT POSTSECONDARY, VOCATIONAL, TECHNICAL, TRADE AND BUSINESS SCHOOLS

246.203 "School" means any non-governmental, postsecondary, vocational, technical, trade, or business non-collegiate educational institution, organization program, home study course, or class maintained or conducted in residence or through correspondence by any person, partnership, association, organization, or corporation for the purpose of offering instruction of any kind leading to occupational objectives of of furnishing a diploma or degree, as defined in subsections (6) and(7), in business, management trade, technical or other vocational education and professional schools not otherwise regulated. Colleges and universities which award a baccalaureate or higher degree and junior colleges which award an associate degree in liberal arts do not fall under the authority granted in ss.246.201-246.231; nor does a nonprofit class provided and operated entirely by an employer, a group of employers in related business or industry, or a labor union solely for its employees or prospective employees or members.

STATE BOARD OF INDEPENDENT COLLEGES AND UNIVERSITIES

246.121 Designation "college" or "university."

(1) The designated use of the title, "college or university" in combination with any series of letters, numbers, or words shall be restricted in this state to degree-granting colleges accredited as defined in s.246.021(1) or licensed under ss. 246.011-246.151 or such colleges as were in active operation and using such designation on April 1, 1970, except with respect to branches or divisions of the parent corporation.

(2) Effective October 1, 1982, no person alone or in concert with others may use the term "university" or "college" as part of the name or other designation of any nonpublic college in this state without authorization from the board. However, no nonpublic college licensed under ss.246.011-246.151 on October 1, 1982, shall be required to change its name to comply with this subsection. The board shall adopt rules for authorizing nonpublic colleges to use the term "university" or "college" as part of their names or designations, which rules shall consider the qualification of the institution to award degrees and may include minimum standards similar to those prescribed by law for licensing.

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	STATE BOARD OF INDEPENDENT POSTSECONDARY VOCATIONAL, TECHNICAL, TRADE AND BUSINESS SCHOOLS	STATE BOARD OF INDEPENDENT COLLEGES AND UNIVERSITIES
JURISDICTION	Rule 6F-1.01(2), FAC Those institutions which do not grant associate or higher degree and which otherwise meet the definition of "school" as set forth in Section 246.203(1), F.S.	Rule 6E-1.031(2), FAC Those institutions which grant an associate or higher degree in which is included (18) or more quarter hours or (12) or more semester hours in general education or liberal arts courses; and which courses do not contribute to the specific specialized degree.

Note: The above definitions do not in and of themselves preclude duplicate licensing. Five institutions are licensed by both boards:

1. Florida Career College
2. Florida College of Business
3. Martin Technical College
4. Tampa Technical Institute
5. United Electronics Technical Institute

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APPENDIX D

State Board Rule on Program Review

This is a new rule.

6A-10.39 Planning and Coordination of Postsecondary Educational Programs. The following provisions are established for the planning and coordination of the postsecondary educational program reviews.

(1) The Division of Vocational, Adult, and Community Education, the Division of Community Colleges, and the Division of Universities shall each submit to the Postsecondary Education Planning Commission on July 1 of each year a five-year program review plan or an annual update of the current five-year plan. These plans shall provide a schedule of the programs or groups of programs to be reviewed and the criteria by which the programs are to be evaluated. For the purpose of this rule, a program is defined as a series of courses leading to a college degree or a postsecondary adult vocational certificate, or classified as college preparatory or vocational preparatory. Community Instructional Services is also defined as a program.

(2) Periodic program reviews relating to other institutional activities may be conducted as needed.

(3) The Postsecondary Education Planning Commission shall examine the program review plans to determine that:

(a) The scheduling of the program reviews is coordinated among sectors,

(b) The plans are in conformity with the program review criteria listed in the state master plan for postsecondary education prepared pursuant to Section 240.147(2), Florida Statutes, and

(c) The criteria address the distinctive institutional roles as defined by the state master plan for postsecondary education prepared pursuant to Section 240.147(2), Florida Statutes.

(4) Subsequent to review and discussion of the divisions' plans with the divisions, the Postsecondary Education Planning Commission shall forward comments on any areas of conflict or issues of particular concern to the State Board within sixty (60) days of receipt of the plans.

(5) The results of the program reviews shall be related to the budgeting process in the following manner:

(a) The program reviews shall include an assessment of the fiscal impact of each recommendation. These assessments may include recommendations to increase or decrease funding levels.

(b) For each program or group of programs the divisions shall develop resource measures and related standards which will determine an adequate level of support for an effective and efficient program. The results of the application of the resource measures in program review shall be related to the budget requests for program growth and improvement.

(c) The divisions' budget requests shall designate adjustments in funding level designed to implement program review recommendations. Such budget requests shall support program decisions that are in conformity with the distinctive institutional roles as defined by the state master plan for postsecondary education prepared pursuant to Section 240.147(2), Florida Statutes.

(d) The effect of appropriations made in conjunction with the provision of Rule 6A-10.37 (6) (C), FAC, shall be evaluated by the divisions as a specific component of the next five-year review.

Specific Authority 229.053(1), 240.147(2)(5)(8), 240.209(5)(b), 240.312 FS. Law Implemented 229.053(2)(c), 240.147(2)(5)(8), 240.209(5)(b), 240.312 FS. History - New

APPENDIX E

COPA/SHEEO Study on Accreditation and the Authorization of Distance Learning Through Telecommunications

STATEMENT ON
ACCREDITATION AND AUTHORIZATION OF
DISTANCE LEARNING THROUGH TELECOMMUNICATIONS

Introduction

This Statement summarizes the results of a two year study on assessing long distance learning by telecommunications. The study, co-sponsored by the Council on Postsecondary Accreditation and the State Higher Education Executive Officers Association, focused on the rapid development and use of telecommunications to offer postsecondary education and the need to ensure the quality and integrity of this instructional activity. It was supported by a grant from the Fund for the Improvement of Postsecondary Education, whose views it does not necessarily reflect.

A series of task forces and advisory committees were responsible for developing the components in the Statement. During their deliberations, each group affirmed the need to address the quality of telecommunications instruction within the existing assessment framework, which includes state authorization, non-governmental voluntary accreditation, and institutional self-regulation. This belief is reinforced in the principles and procedures which follow. The following definition was used during the study.

> Telecommunications instruction is any course or series of courses offered or sponsored by a postsecondary education institution, consortium of institutions, or other organization, for which credit is offered or awarded toward a certificate, diploma, or degree. The course or courses must have, as the primary mode of delivery, television, video cassette or disc, film, radio, computer, or other supportive devices which build upon the audio-video format. In many instances, the telecommunications course is supported by textbooks, study guides, library resources, and other study aids, and may also involve personal interaction with faculty, tutors, or other educational personnel by telephone, mail, or in face-to-face meetings.

I. General Principles

A. The assessment of programs delivered by telecommunications should take place within the context of an institution's or other organization's total educational mission.

B. The policies and procedures for assessing long distance learning should not discourage the development and use of technology for educational purposes. Specific requirements by state authorizing agencies and accrediting bodies should accommodate constructive innovation.

C. The focus of states' authorization and of non-governmental accreditation activity in long distance learning by telecommunications should be on postsecondary institutions and other organizations which award credit that can be applied toward academic degrees, or which provide other credentials that have credit bearing significance such as programs leading to certification of proficiency or licensure. Authorization and accreditation requirements should not apply to those institutions and organizations which are involved only in the production of courses or support materials.

D. State authorization activities are and should be the initial step and a necessary prerequisite to accreditation in the assessment of long distance learning by telecommunications.

E. The states have a responsibility in consumer protection which should be reinforced as necessary. States without adequate authorization legislation are urged to develop such legislation.

F. Institutions and other organizations involved in telecommunications instruction, as in other instructional activities, should use and further develop rigorous outcome measures to assess program effectiveness. Accrediting bodies and state authorizing agencies should validate and use such measures to the greatest possible extent in their evaluation activities.

G. The focus of the assessment activity for long distance learning by telecommunications conducted by educational institutions should be accreditation, either institutional or professional as appropriate to the offerings.

H. The interests of higher education and the general public are best served when institutions voluntarily seek appropriate approval even in situations in which they may not be required to do so. Toward this end, the accreditation and authorization of telecommunications-based educational programs should be thorough and reasonable. If this can be accomplished, then the institutional burden of seeking approval will be a reasonable price to pay for increased public confidence.

I. The necessity of an institution's seeking state authorization depends in large measure upon the institution's "physical presence" in the state or states in which it wishes to operate. Although there is yet no clear legal definition of "physical presence" the following guidelines have been developed.

1. The act of transmitting an electronic signal into another state without any other contact within that state does not, under current laws, constitute physical presence. Similarly, the use of an interstate interactive computer system to deliver educational services, absent any other instate contact, would not necessarily create jurisdiction over the out-of-state institution.

2. The use of interstate mail and telephone services to provide instructional and related services to students involves protected interstate commerce and, therefore, generally cannot be subjected to state regulation.

3. The presence of an institutional recruiter (agent) in a state may constitute sufficient physical presence of an institution in that state to subject it to licensure. It may also subject the institution to other legal constraints.

4. Support services that include institutional representatives in a state, such as tutors, counselors, or instructors, in most instances establish physical presence sufficient to afford the state jurisdiction through its approval mechanism.

II. Procedures

A. A primary and fundamental objective is the development of close working relations among state authorizing agencies, accrediting bodies, and institutions. They should undertake to reexamine and develop regulations, standards, and criteria for use in the evaluation of instruction delivered by telecommunications. State agencies and accrediting bodies should work together to ensure that state authorization provisions and procedures and accrediting standards complement each other. By undertaking this joint effort, a second objective of reducing the multiple and repetitive procedures currently required for institutions operating in several jurisdictions may be realized.

The following procedures are suggested as an initial step toward meeting those objectives.

1. With respect to the states:

   a. States should provide mechanisms to exchange information with each other and with accrediting bodies concerning standards, procedures, and actions relating to the authorization of institutions to operate and grant degrees.

   b. State authorizing agencies should seek more uniform authorization requirements so that educational institutions eventually can receive authorization in all jurisdictions through common assessment procedures.

   c. The states have constitutional and statutory responsibility to provide and supervise education. In those states where statutes providing supervision of postsecondary institutions currently do not exist, appropriate legislation should be sought, and the means for reviewing and authorizing educational operations and institutions should be established. Due consideration should be given to instruction delivered by telecommunications.

The State Higher Education Executive Officers Association should continue to work closely with the states to attain these objectives.

2. With respect to regional, national, and specialized accrediting bodies:

   a. Accrediting bodies should continue to develop standards and procedures for off-campus programs, including instruction delivered by telecommunications, in harmony with the COPA policy statement on off-campus operations and institutional and accrediting bodies agreements of understanding.

   b. Accrediting bodies, through COPA, should create better mechanisms for the exchange of information with each other and with all affected state agencies concerning standards, procedures, and actions relating to the accreditation of institutions and programs and their off-campus activities, including instruction delivered by telecommunications.

c. Accrediting bodies, as they do now for all other programs, should require institutions involved in long distance learning by telecommunications to have the appropriate authorization to operate in any state in which they wish to offer instruction.

d. Accrediting bodies should require demonstration by an institution or, in the case of specialized accreditation, by the program under evaluation that its students achieve the educational objectives set for them. Currently accepted criteria of accreditation can be applied to institutions and programs offering long distance learning or using telecommunications and other electronic techniques. These criteria require, in accordance with accreditation standards, that institutions or programs:

   1) Have clearly defined and appropriate educational objectives.

   2) Have the resources and structure needed to accomplish these objectives.

   3) Demonstrate that these objectives are being accomplished.

   4) Give reasons to believe that these objectives will continue to be accomplished.

The Council on Postsecondary Accreditation should continue to work closely with accrediting bodies to attain these objectives.

III. Implementation

The following specific procedures are suggested to effect these recommendations:

A. An institution should give to the appropriate state agencies and accrediting bodies advance notice of intent to initiate programs using telecommunications that provide credit applicable toward degrees.

B. To obtain appropriate recognition from state agencies and accrediting bodies, the following strategy is suggested:

1. An institution would provide documentation on the objectives and scope of its programs using telecommunications, including provision for instruction and instructional support. This information would be provided on the Institutional Profile for Telecommunications Instruction (see attachment), a document designed to provide state agencies and accrediting bodies with crucial information about telecommunications-based activities.

2. State agencies and accrediting bodies would review the documentation to determine whether the instruction and instructional support meet the established requirements and standards.

3. The documentation would be audited, as appropriate, by state agencies and accrediting bodies and certified as being complete, accurate, and representative of the institution's telecommunications activities. The certified documentation could then be made available to any state agency or accrediting body needing such information.

4. If proper quality and quality controls are evident, approval would be granted by state agencies and accrediting bodies to include the activity within the institution's recognized status.

5. If necessary to reach a sound decision, a state agency or accrediting body may request additional documentation or schedule an on-site visit. The institution, for its part, may withdraw its request without prejudice or appeal any adverse decision to the appropriate body or bodies consistent with due process procedures.

C. Interregional or other agreements envisioning a single accrediting activity for an institution, conducted cooperatively by two or more accrediting bodies, should be fully implemented as they relate to long distance learning so that the accreditation of an institution can be conducted in a single process.

Conclusion

The principles and procedures recommended in this Statement were formulated to ensure the highest quality and integrity of instruction delivered by telecommunications. If adopted by state authorizing agencies and accrediting bodies, there will be a better likelihood of increased cooperation between them, and an important step will have been taken toward instituting common, reasonable and thorough approval practices.

Endorsed by the State Higher Education Executive Officers Association, August 1, 1984, and by the Council on Postsecondary Accreditation, October 11, 1984.

APPENDIX F

Information on Institutional and Program Regulation in Other States

LICENSURE AND REGULATION OF POSTSECONDARY EDUCATION INSTITUTIONS AND PROGRAMS IN OTHER STATES

In July, 1984, a letter was sent to each of the state postsecondary education agencies describing the Commission's legislative charge. Specifically requested was information on rules and regulations which exist on state postsecondary accreditation. Information was also solicited on the postsecondary institutions and any state policy which may link the state's governing or coordinating board with the regional accrediting association.

Responses were received from thirty-six states including each of the seven states in which, according to COPA officials, state policies on accreditation do exist. Below is a summary of responses received regarding licensure and regulation of postsecondary institutions and programs in these states. The information which appears is based upon information specified in the correspondence received from the agency contacted in each state. For the purpose of clarity, the following definitions will apply to the column headings which appear:

State Policy Exist?	Does a state-wide policy exist which pertains to requirements which colleges, universities, and vocational schools must meet before they can operate as educational institutions accepted and recognized by the state?

State Licensure Required?	Are vocational schools, community colleges and universities required to be licensed by the state before they may operate as legitimate postsecondary institutions?
Type Institution Involved	Public, independent or proprietary colleges, universities or vocational schools affected by the state's regulation. (Note: Most respondents did not specify type of postsecondary institution)
Specific Requirement	Standard of acceptance required by the state whether "certification", "authorization", "licensure", "accreditation."
Responsible Regulatory Agency	The organization or governing body charged with the evaluation, approval, and/or licensure of institutions operating within the state.
State Approval Required for Individual Programs?	Must the state (or its designated agency) approve of the academic programs offered by each institution involved?
Regional Accreditation Association	The regional agency designated for accreditation of institutions within the geographic region in which the state is located.

Association's Relationship with State Governing Board(s)	Any linkage or interaction, formal or informal, existing between the regional accrediting agency and the board(s) which control postsecondary institutions within the state.
Current Concerns	Any efforts or concerns (as indicated by the respondent) being undertaken which may have impact on the state's future directions and policy.
Comments	Additional information shared by the respondent which relates to certification and licensure within the state.

LICENSURE AND REGULATION OF POSTSECONDARY EDUCATION INSTITUTIONS AND PROGRAMS IN OTHER STATES

State	State Policy Exist?	State Licensure Required?	Type Institution Involved	Specific Requirement	Responsible (Regulatory) Agency	State Approval Required for Individual Programs?	Regional Accreditation Association	Association's Relationship With State Governing Board(s)	Current Concerns	Comments
Alabama	Yes	Yes	Independent and Proprietary	Accreditation and Licensure	State Board of Education	Yes	Southern Association of Colleges and Schools (SACS)	The Alabama Commission on Higher Education holds full membership in SACS, but the Commission's representative is not on a review team	Currently researching the future role and scope of the Commission on Higher Education in review and regulation of out-of-state institutions.	Commission's articulation with SACS may lead to policies and practices for accreditation of postsecondary institutions.
Alaska	Yes	Yes	All Postsecondary Educational Institutions	Licensure	Commission on Postsecondary Education	Yes	Northwest Association of Schools and Colleges (NASC)	No formal agreement, but CPE provides an observer on NASC evaluation team.		While the Commission on Postsecondary Education administers licensure, it also approves the VA/SAA function, and the Student Loan Program, and integrates the three functions in licensing and regulatory practices.
Arizona	Yes	Yes	Public Community Colleges and Universities	Licensure	Public Governing Boards	None identified	North Central Association of Colleges and Schools (NCACS)	No formal agreement		
	Yes	Yes	Private	Licensure	State Board of Private Postsecondary Education					

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State	State Policy Exist?	State Licensure Required?	Type Institution Involved	Specific Requirement	Responsible (Regulatory) Agency	State Approval Required for Individual Programs?	Regional Accreditation Association	Association's Relationship With State Governing Board(s)	Current Concerns	Comments
California	Yes	Yes	Public	Regional Accreditation	Postsecondary Education Commission	Yes	Western Association of Schools and Colleges (WASC)	No formal agreement, but working relations exist between the two regulatory agencies for community colleges	The Accrediting Commission for Community and Junior Colleges and the Board of Governors for Community Colleges are exploring ways that state evaluation and planning can become more aligned with the accreditation self-study process.	Independent institutions are exempt from state oversight based upon regional and superintendent's regulation.
			Independent	Regional Accreditation, and Authorization by Superintendent of Public Instruction	Office of Private Postsecondary Education	No				
			Vocational Schools	Authorization	Department of Consumer Affairs	No				
Colorado	Yes	Yes	Proprietary Schools	Authorization	State Board for Community Colleges and Occupational Education	Yes	North Central Association of Colleges and Schools (NACS)	No relationship identified.	Officers in public institutions believe accreditation requirements too weak-permits too much competition from low quality private and out-of-state institutions.	State accreditation predicated on regional or an alternate agency approved by the Commission
	Yes	None identified	Public and Independent Colleges and Universities	Authorization (Based on Regional Accreditation	Colorado Commission on Higher Education					
Connecticut	Yes	Yes	Public and Independent Postsecondary	Licensure (may be based on regional accreditation, if BOG chooses)	Board of Goveners	Yes	New England Association of Schools and Colleges (NEASC) (Primarily for out-of-state institutions)	No relationship identified	In 1985, will be revising regulations to provide more guidance in review of alternate and off-campus programs.	
Georgia	Yes	Yes	Public	Approval	State Board of Education	Yes	Southern Association of Colleges and Schools (SACS)	No relationship identified		Board of Regents does not get involved in regulation of in-state private institutions.

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State	State Policy Exist?	State Licensure Required?	Type Institution Involved	Specific Requirement	Responsible (Regulatory) Agency	State Approval Required for Individual Programs?	Regional Accreditation Association	Association's Relationship With State Governing Board(s)	Current Concerns	Comments
Idaho	Yes	Yes	Public and Independent	Accreditation (based on regional)	State Board of Education	Yes	Northwestern Association of Schools and Colleges (NASC)	No formal agreement identified, but State Board designates a representative for all accreditation studies	October '84-first coordinated evaluation between State Board and the regional accrediting agency for the Idaho Postsecondary Education System.	
Illinois	Yes	Yes	Public and Independent	Authorization (in no way contingent upon regional accreditation)	Board of Higher Education	Yes	North Central Association of Colleges and Schools (NCACS)	Informal relations between NCACS and BHE. Regional accreditation contingent upon state authorization.	BHE sensed need to merge state and regional statutes for number of years, but unsuccessful due to lack of consensus among various sectors of higher education.	
Indiana	Yes	Yes	Independent	Accreditation	Commission for Postsecondary Education	Yes	North Central Association of Colleges and Schools (NCACS)	No relationship identified		Only one private postsecondary insitution accredited by the Commission
Iowa	No	Yes	All Postsecondary Institutions	Report of Regional and Professional Accreditation	Board of Regents	None identified	North Central Association of Colleges and Schools (NCACS)	No relationship identified		Reports required by BOR include all correspondence, self-studies, and site visits.
Kentucky	No	Yes	Nonpublic (in-state and out-of state)	Licensure (recognizes regional accreditation)	Council on Higher Education	Yes	Southern Association of Colleges and Schools (SACS)	No relationship	Problem cited by the CHE due to lack of linkage with the regional accrediting agency. One institution put on probation without prior notice to the Council.	Various states have approached SACS about formal role in accreditation, but overtures rejected by SACS.

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State	State Policy Exist?	State Licensure Required?	Type Institution Involved	Specific Requirement	Responsible (Regulatory) Agency	State Approval Required for Individual Programs?	Regional Accreditation Association	Association's Relationship With State Governing Board(s)	Current Concerns	Comments
Louisiana	No	No	All Post-secondary Institutions	Registration	Board of Regents	No	Southern Association of Colleges and Schools (SACS)	No relationship identified		Registration as an educational institution is required for a data base only.
Maine	No	None identified	None identified	None identified	None existent (Maine Postsecondary Education Commission no longer active)	None identified	New England Association of Schools and Colleges NEASC)	New England Association keeps the Department of Education and Cultural Services informed about on-site visits and the accreditation status of institutions		
Maryland	Yes	Yes	Public	Evaluation and accreditation	State Board for Higher Education	Yes	Middle States Association of Colleges and Schools (MSACS)	Cooperative arrangement between Middle States and BHE in evaluation and accreditation of Maryland Public Institutions		Middle States and BHE cooperate on selection of evaluation team members, travel expenses, and on reports, but each free to pursue its own agenda. Cooperate to avoi duplication and undue burdens on insitutions
Michigan	Yes	Yes	Independent Non-Degree Granting Institutions	Licensure	State Board of Education	Yes	North Central Association of Colleges and Schools (NCACS)	No relationship identified		
Nebraska	Yes	Yes	New Independent	Authorization (Provisional accreditation)	Coordinating Commission for Postsecondary Education	Yes	North Central Association of Colleges and Schools (NCACS	No relationship identified		

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State	State Policy Exist?	State Licensure Required?	Type Institution Involved	Specific Requirement	Responsible (Regulatory) Agency	State Approval Required for Individual Programs?	Regional Accreditation Association	Association's Relationship With State Governing Board(s)	Current Concerns	Comments
Nevada	None identified	None identified	Public	None identified (all institutions accredited by regional association)	Northwest Association of Schools and Colleges (NASC)	None identified (accredited by national professional accrediting associations)	Northwest Association of Schools and Colleges (NASC)	No relationship identified (but all schools accredited by NASC)		
New Hampshire	Yes	Yes (based on regional accreditation)	All Postsecondary Institutions	Accreditation (in lieu of evaluation)	Postsecondary Education Commission	Yes	New England Association of Schools and Colleges (NEASC)	No formal relationship identified	Commission considering requiring institutions to submit their self-studies and final reports of the accrediting association to the Commission in order to be accredited by the state.	Commission has found that a review by the Commission and the regional accrediting body would be redundant
New Jersey	Yes	Yes	All Postsecondary Institutions	Licensure	State Board of Higher Education	Yes	Middle States Association of Colleges and Schools (MSACS)	No relationship identified		
New Mexico	None identified	None identified	Independent Institutions	None identified (institutional decision)	North Central Association	Not indicated	North Central Association of Colleges and Schools (NCACS)	No relationship identified		
New York	Yes	Yes	All Postsecondary Institutions	Registration and state accreditation	State Board of Regents (via the Department of Education)	Yes	Middle States Association of Colleges and Schools (MSACS)	Department of Education conducts review visits in coordination with the Middle States Association		All institutions and individual programs must be accredited by the New York Board of Regents
North Carolina	Yes	Yes	Independent and Proprietary	Licensure	Board of Governors	Yes	Southern Association of Colleges and Schools (SACS)	No formal relationship, but staff from the University System are actively involved in SACS		Staff members of Board of Governors are actively involved in SACS

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State	State Policy Exist?	State Licensure Required?	Type Institution Involved	Specific Requirement	Responsible (Regulatory) Agency	State Approval Required for Individual Programs?	Regional Accreditation Association	Association's Relationship With State Governing Board(s)	Current Concerns	Comments
North Dakota	None identified	Not specified	Public	None identified	North Central Association of Colleges and Schools	Not indicated	North Central Association of Colleges and Schools (NCACS)	State governing board is involved on accreditation teams at the invitation of NCACS)		
Oklahoma	Yes	Yes	Public Colleges and Universities and Vocational-Technical Postsecondary Programs	Accreditation	State Regents for Higher Education	Yes	North Central Association of Colleges and Schools (NCACS)	No relationship identified		Although the NCACS accredits other institutions within its region, the State of Oklahoma is responsible for the accreditation of all postsecondary institutions throughout the state.
Oregon	Yes	Yes	Public, Independent and all out-of-state institutions	Approval	Oregon Educational Coordinating Commission	Yes	Northwest Association of Schools and Colleges (NASC)	No formal relationship indicated, but the Commission acknowledges accreditation by regional or national accreditation agencies		
Pennsylvania	Yes	Yes	All Postsecondary Institutions	Approval	State Board of Education	Yes	Middle States Association of Colleges and Schools (MSACS)	Members of DOE serve on evaluation visits conducted by Middle States		
Rhode Island	Yes	Yes	Public Independent and Proprietary	Authorization (partially based on accreditation)	Office of Higher Education	Yes	New England Association of Schools and Colleges (NEASC)	No relationship identified		
South Carolina	Yes	Yes	Public and Independent	Licensure	Commission on Higher Education	Yes	Southern Association of Colleges and Schools (SACS)	No relationship identified		Believes licensure process for private institutions has been quite successful

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State	State Policy Exist?	State Licensure Required?	Type Institution Involved	Specific Requirement	Responsible (Regulatory) Agency	State Approval Required for Individual Programs?	Regional Accreditation Association	Association's Relationship With State Governing Board(s)	Current Concerns	Comments
Texas	Yes	Yes	Independent	Certification	Coordinating Board, Texas College and University System	Yes	Southern Association of Colleges and Schools (SACS)	No relationship identified		The Coordinating Board recently approved modifications to its rules on certification of private degree-granting instutitions. (Copies of modifications not available)
Utah	None identified	None identified	Public	Accreditation	Northwest Association of Schools and Colleges (NASC)	Not indicated	Northwest Association of Schools and Colleges (NASC)	No relationship identified		
		No	Independent	Registration	State Office Governing Business Practices	Yes	Northwest Association of Schools and Colleges (NASC)			
Vermont	Yes	Yes	All	Approval and Authorization	State Board of Education	Yes	New England Association of Schools and Colleges (NEASC)	No relationship identified		The Council feels that accreditation provides validation of the quality of an institution's offerings through peer group review, and it fills a void in the Council's licensure process which is difficult to address.
Virginia	Yes	Yes	Degree Granting Postsecondary Institutions	Approval and Accreditation	Council of Higher Education	Yes	Southern Association of Colleges and Schools (SACS)	No relationship identified		
			Non-Degree Granting Postsecondary Institutions	Licensure	Virginia Department of Education Proprietary School Services	Not indicated				

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Washington	Yes	Yes	All	Certification	Council for Postsecondary Education	Yes	Northwest Association of Schools and Colleges (NASC)	The Council for Postsecondary Education is linked with the regional accreditation association in administering the Educational Services Registration Act.		CPE requires communication (between the regional or national accrediting agency and the institution under review) throughout evaluation processes
West Virginia	Yes	Yes	Public Independent and Proprietary	Accreditation and Approval	Board of Regents	Yes	North Central Association of Colleges and Schools (NCACS)	No formal agreement, but one obsever from the BOR participates in the process leading to accreditation by the regional accreditation agency		
Wisconsin	Yes	Yes	New Proprietary	Not indicated	Education Approval Board	Not indicated	North Central Association of Colleges and Schools (NCACS	No relationship identified		

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